



Effective From:	Next Review Date:	Policy Managed by:
01/09/2024	02/09/2025	Managing Director – D Coomer
Date: 01/09/2024	Signed by: Darren Coomer	

### Links to Safeguarding/Cause for Concern report forms:

- [For Internal S&A Staff](#)
- [For Learners and Employers](#)

Tel: 0204 551 1997 Option 6

[safeguarding@sandaacademy.ac.uk](mailto:safeguarding@sandaacademy.ac.uk)

## Safeguarding Policy

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Validated by:	Designated Safeguarding Lead
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This policy will be reviewed on an annual basis. reserves the right to amend this policy, following consultation, where appropriate.

Date created:	01.03.23
Date of last review:	06.03.24 – updated September 2024
Date of next review:	02.09.2025

## 1. Introduction

All S&A Academy Training staff, governing body, associates, third-party providers, employers and volunteers have a duty of care to safeguard and promote the welfare of learners. Everyone working with learners, vulnerable adults and their families should be familiar with this document and with their role in reporting any safeguarding concern to the relevant local authority and also within S&A Academy Training 's internal recording procedure.

This policy is also available to learners and other stakeholders at the initial point of their engagement with S&A Academy Training, is readily available to all staff, learners and stakeholders during annual review and a copy can be requested from [safeguarding@sandaacademy.ac.uk](mailto:safeguarding@sandaacademy.ac.uk) It is also available on our website at <https://sandaacademy.com/>

S&A Academy Training approach to safeguarding all of our learners is founded on the nature of our relationships. We prioritise assessing and managing the needs of our services users and have a dynamic approach to the identification, assessment, and response to risk. We have a

commitment to ensuring that during all staff and learner induction, Health and Safety, Safeguarding, Prevent, Whistleblowing and Complaints procedures are fully covered. As well as initial induction we ensure that all staff have annual refresher training on both Safeguarding and Prevent to promote our commitment to keeping learners safe.

Our organisational structure and approach places emphasis on collaborative relationships with our learners and our partners in delivery. This means our response to need and risk is timely and effective. We ensure that we work together to learn the lessons from our practice and use them to inform our safeguarding.

Our staff are informed in terms of the indicators of possible harm and possible vulnerabilities. Staff know what to do when possible abuse or neglect is suspected or disclosed and are skilled in a range of interventions to prevent further or future risk to our learners.

Our goal is to enable the learner. This means that we focus on supporting them in finding their own solutions to challenges that pose a risk to their well-being, empowering them to make positive sustainable changes to their lives.

This policy outlines our organisational standards in safeguarding - S&A Academy Training uses these standards to measure our performance and achievements in safeguarding within all of our education provision. We also outline a range of behaviours that we encourage staff to embed in their approach to safeguarding that in turn, we believe, supports effective safeguarding practice and the prevention of harm. This policy references key legislation and statutory guidance and outlines how we approach safeguarding at local delivery level. It addresses the need to safeguard in all of our practice contexts.

Key Themes	Evidence of standards
<p><b>1.</b> <b>Good Leadership and Accountability</b></p>	<ul style="list-style-type: none"> <li>• A clear commitment to the safeguarding of all learners</li> <li>• A clear line of accountability within the organisation for safeguarding and promoting welfare</li> <li>• Leadership which ensures a dynamic and responsive approach to need and risk in safeguarding, so that we achieve positive outcomes for our learners</li> <li>• A shared strategic approach to safeguarding with our partners, through engagement in the activity of strategic partnerships</li> </ul>

<p><b>2. Clear and embedded Policies and Procedures</b></p>	<ul style="list-style-type: none"> <li>• A clear priority to safeguard all learners: we have defined outcomes for them, explicitly stated in contractual and delivery documentation and demonstrated through the impact of local delivery and individual outcomes.</li> <li>• We provide information and training and access to local procedures for safeguarding that staff are clear on their role and responsibilities in reporting abuse and neglect and on their involvement in safeguarding responses which prevent and protect.</li> <li>• We ensure that our policies and procedures are in accordance with national statutory guidance</li> </ul>
<p><b>3. Best practice in safeguarding children and vulnerable adults 'at risk'</b></p>	<ul style="list-style-type: none"> <li>• We ensure that our local practice that reflects our organisational approach and we monitor how this leads to positive outcomes for service users.</li> <li>• We support our staff in making effective and proportionate responses to specific safeguarding concerns that have the learner at the centre.</li> <li>• We prioritise effective multi-agency work with our partners in delivery to prevent harm and protect learners from risk, operating at the centre of local arrangements.</li> <li>• We prioritise outcomes for learners which evidence the reduction of risk; the minimisation of the impact of harm; their access to criminal, civil or social justice; and successful resolution and recovery.</li> </ul>
<p><b>4. A commitment to all staff, prior to access with learners having a DBS check and registered on the updating service, including safe recruitment and selection practices</b></p>	<ul style="list-style-type: none"> <li>• We have a Safer Recruitment policy and human resources management procedures that take account of the need to safeguard children and young people and adults at risk that include arrangements for appropriate checks as well the participation of staff and learners in the recruitment of new staff and volunteers.</li> <li>• We have clear procedures and practice that ensure an effective response to allegations of abuse or neglect against professional S&amp;A Academy Training staff/ associates/volunteers.</li> </ul>
<p><b>5. A robust learning organisation</b></p>	<ul style="list-style-type: none"> <li>• S&amp;A Academy Training has a learning culture that acts upon the lessons from reporting, auditing and reviewing and ensures feedback into practice to ensure that improvements are made.</li> <li>• Our performance management framework ensures that the organisational centre understands safeguarding risks and the response at local delivery level to these risks.</li> </ul>

<p><b>6. Staff Induction, Training and Development</b></p>	<ul style="list-style-type: none"> <li>• All staff, including associates, temporary staff and volunteers who work with S&amp;A Academy Training learners, are made aware of the organisational approach to safeguarding from induction onwards.</li> <li>• A robust initial induction for each staff member ensures that all S&amp;A Academy Training staff undertake appropriate training to equip them to carry out their safeguarding responsibilities effectively, and keep this up-to-date with annual CPD for all staff i.e. by refresher training at regular intervals</li> <li>• That staff supervision and development addresses the workforce's role in safeguarding and reviews workforce performance. This ensures reflecting upon practice to ensure that the safeguarding behaviours are evident.</li> </ul>
<p><b>7. Listening to Learners</b></p>	<ul style="list-style-type: none"> <li>• A commitment to co-design in safeguarding practice and delivery through a culture of listening to, and engaging in dialogue with learners, seeking learner's views. We take account of those views in individual decisions to inform the establishment or development of services.</li> </ul>



## *S&A Academy Training Safeguarding behaviours*

S&A Academy Training believes that meaningful relationships make a difference in people's lives. Key aspects of these relationships are trust and empathy but with clear boundaries. Our priority is to be more human – building relationships with learners and partners that offer help and the prospect of positive change. This is supported by a commitment to the following S&A Academy Training behaviours in safeguarding practice, which we believe contribute to the prevention of harm

- **Confidence** in practice – knowing when to report and refer, seek consent, ask for assistance and information, being a source of expertise
- **Curiosity** in our relationships with learners, whilst being respectful of their rights
- **Committed** to productive partnerships with professionals whilst being able to make professional **challenges** and **escalate** concerns in practice
- Keeping the **learner as the focus** of their practice and supporting them through their involvement in safeguarding processes
- Being **aware and informed** of both the harmful and positive aspects of **risk**

## **2. Staff Induction, Training and Development**

The expectations of staff training as outlined in detail throughout Keeping Children Safe in Education have been summarised and shared within the policy and procedures. This will be updated if, and when further updates are made. There is a mandatory safeguarding training offer for all staff within S&A Academy Training, for new staff and annual refresher training.

All S&A Academy Training staff must complete an appropriate safeguarding course at foundation level and DSL must complete the appropriate DSL qualifications and renewal.

There are detailed requirements for safer recruitment outlined in KCSiE. These include specific requirements for education settings include keeping a Single Central Record (single check register) of the staff recruited and the required checks (i.e. DBS) that have been undertaken by the school. Please also refer to our Safer Recruitment Policy.

All staff have enhanced disclosure as working with under 18 s and vulnerable groups form part of our education offer.

For our staff- It is important that you:

- Take up the mandatory training and development opportunities that S&A Academy Training offer you as a volunteer or member of staff in an education setting (including Prevent/ FGM at gov.uk)

- Familiarise yourself with local opportunities for multi-agency safeguarding training and other opportunities in developing safeguarding practice (mentoring, shadowing)
- Through the supervision and Contribution Review process with your line manager and other opportunities, consider and examine what knowledge and skills and behaviours you need to carry out your role in safeguarding properly in your education setting
- Seek out and reflect upon any feedback from colleagues, peers and learners about what you do in practice
- Identify if there are new and different ways that S&A Academy Training could improve their offer to you in your safeguarding role as DSL

S&A Academy have a clear commitment to ensure that the Central Record is up to date in order to evidence the gaps in vetting; references and DBS check with automatic annual renewal on the updating service, ensuring it is clear to all staff that learners are protected from unsupervised contact with who have not be subject to the required checks.

We have developed a *'what to do approach'* for staff across all S&A Academy Training. The implementation and embedding in practice of the content of this document form part of a learning outcome for our basic mandatory safeguarding training.

All staff in the role of Designated Safeguarding Lead (DSL) in S&A Academy Training education settings, will attend mandatory annual training awareness and the Home Office Prevent awareness training.

S&A Academy Training staff are also trained in the internal S&A Academy Training safeguarding reporting procedure and this is implemented both during staff induction and on an annual basis as mandatory. These details are outlined and described in Keeping Children Safe in Education (KCSiE) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> , This policy and guidance is read by all staff members at induction.

We not only ensures whether arrangements for Safeguarding learners are appropriate and effective <https://www.gov.uk/government/publications/education-inspection-framework> but we have also implemented outstanding measures to ensure that safeguarding policy and procedures are fully embedded into the learning journey and we work closely with employers to ensure the most effective systems are in place.

The S&A Academy Training Safeguarding policy links to other relevant policies within the setting to ensure awareness of specific safeguarding issues and how to respond across the education setting's community: staff, parents and learners.

These details are outlined and described in Keeping Children Safe in Education (KCSiE) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

This policy and guidance is read by all staff members and evidence of this kept on staff files and made available to learners/ parents (if appropriate).

In order to support effective practice, the corporate S&A Academy Training safeguarding policy template has been adapted and expanded to meet the requirements of KCSiE, whilst retaining its structure.

All staff and volunteers have a legal duty to report in strict confidence to their safeguarding officer if they have cause for concern and believe that an individual (employed, volunteer, learner, visitor or anyone else at the company) for whatever reason:

- Harmed a child or vulnerable adult or is doing so
- Caused a child or vulnerable adult to be harmed
- Put a child or vulnerable adult at risk of harm
- Attempted to harm a child or vulnerable adult
- Incited another person to harm a child or vulnerable adult ➤ Is a victim of abuse

### **3. What is Safeguarding?**

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances.

The Safeguarding Agenda includes a wide range of potential risks (See decision making tool for help with indicators of Safeguarding concern)

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Exploitation
- Sexual harassment/ child on child abuse
- Child sexual exploitation
- Bullying and cyberbullying
- Domestic abuse
- Substance misuse
- Fabricated and induced illness
- Faith abuse
- Forced marriage

- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation
- Sexting
- Teenage Relationship abuse
- Trafficking and modern slavery
- Breast ironing
- Mental health concerns
- Missing children in education

#### 4. Definitions

**A Child** is defined as anyone under the age of 18.

**An adult at risk** (or vulnerable adult) is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance.

Alongside the Safeguarding Agenda above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service in order to support their need
- Receiving a service due to their age or disability
- Living in residential accommodation as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mothers living in residential care
- Persons under supervision of the probation service

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, examples:

- Poor numeracy and literacy skill or specific learning need
- Unsupportive home environment
- English not the first language
- Unsupportive employer

- Underrepresented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need

<b>Safeguard</b>	Protect from harm or damage with an appropriate measure
<b>Vulnerable</b>	Exposed to the possibility of being attacked or harmed, either physically or emotionally
<b>A vulnerable adult</b>	Is in need of special care, support, or protection because of age, disability, or risk of abuse or neglect
<b>Safeguarding</b>	Is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity
<b>Vulnerability</b>	Describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation

### ***What is 'risk'?***

'Risk' is the future possibility that someone may be harmed due to a range of unwanted or neglectful behaviours. We work to reduce the likelihood of harm to our learners and to mitigate the impact of that harm in terms of its' severity.

'Harm' is sometimes 'significant' to a child or young person (Children Act 1989). The definitions of emotional, physical and sexual abuse and neglect describe categories of 'harm' and can be found in the document Working Together 2018 and more recently KCSiE. 'Harm' is described as the "ill-treatment or the impairment of health or development". 'Development' means physical, intellectual, emotional, social or behavioural development; 'health' means physical or mental health; and 'ill-treatment' includes sexual abuse and forms of ill-treatment which are not physical.

As a result of the Adoption and Children Act 2002, the definition of harm also includes "impairment suffered by hearing or seeing the ill-treatment of another". This is useful when considering harm arising from domestic abuse.

The abuse and neglect (i.e. harm) to an adult can take many forms - these are listed below as defined in the Care Act 2014:-

Physical abuse

Domestic violence or abuse – including the effect or seeing, hearing or experience of abuse

Sexual abuse

Psychological or emotional abuse

Financial or material abuse

Modern slavery Discriminatory  
abuse

Organisational or institutional abuse

Neglect or acts of omission

Self-neglect

## 5. Our Responsibility

We all have a responsibility to ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help.

We ensure all concerns are dealt with timely and appropriately and we also have a responsibility to minimise the risk of allegations against our staff.

All staff are expected comply with any DBS check request and to have a good understanding of what constitutes a safeguarding or welfare concern and how to provide support, guidance and the channels for escalating a concern.

To assist staff in this, on-going training and awareness, as well as continuous information, advice and guidance are provided to help staff to feel confident in proactively promoting safeguarding and understanding their individual responsibilities.

The responsibilities of particular individuals are detailed below:

### •Our MD –

- To ensure we have effective policies, and these are implemented and followed.
- Ensure enough time and resources are allocated to employees to carry out their responsibilities.

### •Designated Safeguarding Lead

#### DSL and deputy DSL details/ contact information:

Designated Safeguarding Lead:

Carla Stuthridge – [Carla.stuthridge@sandaacademy.ac.uk](mailto:Carla.stuthridge@sandaacademy.ac.uk)  
Tel: 07450 955 053 / 0204 551 1997 option 6

Deputy Safeguarding Lead  
Rachel Thomas – [Rachel.Thomas@sandaacademy.ac.uk](mailto:Rachel.Thomas@sandaacademy.ac.uk)  
Tel: 020 4583 0834

Safeguarding Officer  
Jemma Perks – [jemma.perks@sandaacademy.ac.uk](mailto:jemma.perks@sandaacademy.ac.uk)  
Tel: 020 8152 6605

#### • **Our Regional Trainers/Tutors –**

- To check safety and welfare with all learners at each visit/communication, ensuring learners complete all safety related learning activities within their programme.
- Be aware of the indicators that there may be a safeguarding issue and use the chart for reporting issues. Report in a timely and appropriate manner (see Decision Chart for support on this).

#### • **Support Team –**

- Be mindful of indicators that there may be a safeguarding issue, should you meet a learner or potential learner.
- Follow the Decision Chart for reporting issues that concern them or are reported to them in a timely manner.

Abuse can take many forms including:

- Physical abuse
- Sexual abuse
- Sexual Harassment
- Emotional / psychological abuse
- Neglect
- Physical and mental health

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

In addition to the above, vulnerable adults may also be subject to:

- Financial and material abuse
- Self-neglect

It is important that vulnerable people are protected from any form of harm. As such all complaints, allegations or suspicions must be taken seriously. The following procedure must be followed whenever an allegation is made that a person has been abused or when there is a suspicion that abuse may be taking place.

Harming activities by other persons who are not employed staff or volunteers will be dealt with using normal company procedures for incident management. The police and the local safeguarding boards may nevertheless be involved.

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-isbeingabused-2>

To support the safeguarding agenda, it may on occasion be necessary to refer to other company policies and procedures on Prevent, Health & Safety, Harassment and Bullying, Grievance. In all cases safeguarding will take precedent over other policy and procedure areas.

Allegations of abuse are serious. Where a claim of abuse made against a member of staff is not substantiated and is found to have been malicious in intent, this would be dealt with through the company's learner or staff disciplinary procedure.

We are committed to training all staff to work within the local safeguarding procedures and operational safeguarding arrangements.

There are detailed requirements for safer recruitment outlined in KCSiE. These include specific requirements for education settings include keeping a Single Central Record (single check register) of the staff recruited and the required checks (i.e. DBS) that have been undertaken including the registration on the updating service.

*Please also refer to our Safer Recruitment Policy.*

All staff have enhanced disclosure as working with under 18 s and vulnerable groups form part of our education offer.

## **6. KCSiE. – Updated September 2024**

KCSiE sets out the legal duties that you **must** follow to safeguard and promote the welfare of children and young people, under the age of 18.

Directors and Governors also ensure effective policies, and these are implemented and followed and ensure enough time and resources are allocated to employees to carry out their responsibilities.

**All** employees should read at least [Part 1](#) of the guidance in conjunction with Safeguarding Policy.

KCSiE sets out the legal duties that you **must** follow to safeguard and promote the welfare of children and young people, under the age of 18.

Directors and Governors also ensure effective policies, and these are implemented and followed and ensure enough time and resources are allocated to employees to carry out their responsibilities.

**All** employees should read [Part 1](#) of the guidance during induction in conjunction with Safeguarding

Policy and this is embedded at induction.

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

We use the following resources, plus many more listed in Annex B, to support staff in their understanding, and teach about safeguarding:

UK Council for Internet Safety (UKCIS)<sup>37</sup> guidance:

<https://www.gov.uk/government/publications/education-for-a-connected-world>

UKCIS guidance: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

The UKCIS [external visitors guidance](https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

<https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings>

National Crime Agency's CEOP education programme: [Thinkuknow](https://www.thinkuknow.co.uk)  
<https://www.thinkuknow.co.uk>

Public Health England [Every Mind Matters](https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview)

<https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview>

[Harmful online challenges and online hoaxes](https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. <https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes>

*Child on child abuse (formally Child on child abuse)*

Based on the finds and information in the KCSIE review, we ensure we create an environment and culture where child on child abuse, including sexual harassment and online sexual abuse are not tolerated, where learners feel confident to report their concerns. Our policy informs the approaches and responses to incidents in order to:

- protect the victim and other learners from harm
- meet the needs of the victim and the perpetrator
- help the perpetrator take responsibility for their behaviour
- provide referral pathways to social care services where appropriate to support victims and perpetrators.

We have adopted best practice as identified below:

- The S&A Academy have a whole organisation approach to safeguarding, everyone is responsible and everyone is trained and supported in safeguarding and low risk concerns.
- S&A staff are trained in the signs to identify potential safeguarding concerns and in particular supported to consider any specific community-based risks that the learner may face, for example gangs, county lines, knife crimes etc.
- S&A staff provide an environment of openness where learners feel safe to disclose incidents and concerns knowing that they will be taken seriously and acted on.
- Learners are informed of procedures for reporting incidents and concerns and all staff receive the training necessary to respond sensitively and effectively to these.
- The learner handbook sets out clear behaviour policies and expectations of behaviour for learners.
- The S&A Academy operate a zero-tolerance policy on inappropriate and discriminatory language and behaviour, including sexualised language and behaviour.
- Staff are expected to respond appropriately to challenge any inappropriate or discriminatory language or behaviour and should not ignore, condone or otherwise minimise such behaviour in learners or other staff.
- Staff recognise that some learners are more vulnerable, for example learners with SEND, and take steps to ensure they are able to seek help through regular 1:1s.
- Staff are trained to recognise the role of technology in facilitating bullying, abuse and exploitation, especially sexual harassment and exploitation, and discuss this at reviews.

*Who does this apply to?*

All bodies listed **must** also ensure that all employees read at least Part 1 of the guidance and ensure that mechanisms are in place to assist employees in understanding and discharging their role in accordance with the document.

Additional information added to KCSiE 2022.

*Sharing low-level concerns*

“Schools and colleges should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values champion)), or with the headteacher/principal is a matter for the school or college to decide. If the former, then the DSL should inform the headteacher/principal of all the lowlevel concerns and in a timely fashion according to the nature of each particular low-level concern. The headteacher/principal should be the ultimate decision maker in respect of all lowlevel concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision making approach.”

See page 101/ 102 of new guidance for further information.

*Children who are lesbian, gay, bi, or trans (LGBT)* – page 50 of the new updated 2022 guidance identifies risks and how to mitigate risks and further reading.

**Further reading and information from 2022 update:**

Part five	Child-on-child sexual violence and sexual harassment
Throughout the guidance	We have incorporated the content from the ‘Sexual violence and sexual harassment between children in schools and colleges’ advice into the main body of KCSIE.
Paragraph 469	Added paragraph to highlight the importance of ensuring children understand the law on child-on-child abuse is there to protect them rather than criminalise them.
Paragraphs 483	Added a bullet point to emphasise the importance of understanding intra familial harms and any necessary support for siblings following incidents.
Paragraphs 493	Paragraph added to emphasise the need for schools and colleges as relevant agencies should be part of discussion with statutory safeguarding partners.

Paragraph 534	Paragraph added to explain that children who have experienced sexual violence display a very wide range of responses to their experience.
Paragraph 558	

Forced Marriage

Operation Encompass Abuse

Farrer & Co – Addressing child on child abuse

Working with others

Added information to raise awareness of patterns identified may also be reflective of the wider issues within a local area.

Added link to ‘The right to choose: government guidance on forced marriage’.

Added contact details.

Added link to CSA centre of Expertise on Child Sexual abuse – free resources

Link added to resource for schools and colleges

Added reference and link to the Statutory guidance PACE Code C 2019 – Appropriate adult.

The following resources, plus many more listed in Annex B, may also help schools, providers and Colleges understand and teach about safeguarding:

UK Council for Internet Safety (UKCIS)<sup>37</sup> guidance:

<https://www.gov.uk/government/publications/education-for-a-connected-world>

UKCIS guidance: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-youngpeople/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-youngpeople>

The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

<https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings>

National Crime Agency's CEOP education programme:  
[Thinkuknow https://www.thinkuknow.co.uk](https://www.thinkuknow.co.uk)

Public Health England [Every Mind Matters](https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview)  
<https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview>

[Harmful online challenges and online hoaxes](https://www.gov.uk/government/publications/harmfulonline-challenges-and-onlinehoaxes) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

<https://www.gov.uk/government/publications/harmfulonline-challenges-and-onlinehoaxes>

*Child on child abuse (formally Child on child abuse)*

These expectations were applied to colleges initially. But with the passage of The Education and Training (Welfare of Children) Act 2021 and the application of 'Keeping children safe in education' to ITPs, independent special colleges and 16 to 19 academies and not just maintained schools and FE and sixth form colleges) to the extent that they have students or apprentices who are under the age of 18, it is appropriate that we have the same expectations of those additional types of providers now that the statutory guidance equally applies to them.

Based on the finds and information in the above review, we ensure we create an environment and culture where child on child abuse, including sexual harassment and online sexual abuse are not tolerated, where learners feel confident to report their concerns. Our policy informs the approaches and responses to incidents in order to:

- protect the victim and other learners from harm
- meet the needs of the victim and the perpetrator
- help the perpetrator take responsibility for their behaviour
- provide referral pathways to social care services where appropriate to support victims and perpetrators.

We have adopted best practice as identified below:

- Education providers should have a whole school approach to preventing child on child abuse and sexual violence and harassment, and systems in place to identify risks and take appropriate action to deal with incidents. This approach should be reflected in relevant policies such as behaviour management, online safety, staff conduct etc.
- Education providers should ensure a planned PHSE curriculum conveys the school/college's policy for preventing child on child abuse and promoting respectful behaviour between learners, particularly in relation to sexual conduct, and statutory sex and relationships education should provide opportunities to convey messages on respectful personal and sexual relationships.

- Education providers should carry out a risk assessment to identify the type and prevalence of child on child abuse and any recognisable trends, with a view to putting in preventative measures, and in particular consider any specific community-based risks that the school/college may face, for example gangs, county lines etc.
- Education providers should provide an environment of openness where learners feel safe to disclose incidents and concerns knowing that they will be taken seriously and acted on.
- Learners should be informed of procedures for reporting incidents and concerns and all staff should receive the training necessary to respond sensitively and effectively to these.
- The school/college behaviour policies should set out clear expectations of behaviour for learners and expected sanctions for any breach. Parents should be made aware of these policies.
- The school/college should operate a zero-tolerance policy on inappropriate and discriminatory language and behaviour, including sexualised language and behaviour.
- Staff should be expected to respond appropriately to challenge any inappropriate or discriminatory language or behaviour under school/college policies and should not ignore, condone or otherwise minimise such behaviour in learners or other staff.
- Education providers should recognise that some learners are more vulnerable to child on child abuse, for example learners with SEND, and take steps to ensure they are able to seek help, ensuring policies are flexible to respond to their specific needs.
- Education providers should recognise the role of technology in facilitating bullying, abuse and exploitation, especially sexual harassment and exploitation, and be aware that many incidents will take place online. These incidents should be dealt with under the *model online safety policy for schools and colleges*. [link](#)
- Education providers should be aware of incidents involving learners that take place outside of school and the need to respond appropriately in order to support victims and maintain a safe school environment.
- Education providers must be aware of the following when considering the school/college response to child on child abuse and sexual violence and harassment:

Child on child abuse is likely to breach the pupil's rights under the Human Rights Act 1998.

Some forms of abuse will involve prejudice-based bullying and harassment, or sexual violence or harassment which is primarily directed against specific groups of learners, and the school/college must be aware of their duty under the Equality Act 2010 to ensure these groups are protected and are not discriminated against by school/college policy.

Education providers should remain aware that every pupil, victim or perpetrator, is entitled to an education and it is in the duty of the school/college to ensure that learners' education is not adversely affected as a result of child on child abuse or any action taken in response to incidents.

The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working together to safeguard children.

GDPR and withholding information. 'Governing bodies and proprietors should ensure relevant staff have due regard to the relevant UK protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.' See ICO guidance ['For Organisations'](#)

## 7. Multi-agency working

The 3 safeguarding partners are:

- > Local authority (LA)
- > Clinical commissioning group within the LA
- > police within the LA

## 8. The Role of the DSL

The DSL (nominated person) holds ultimate accountability for ensuring safeguarding arrangements for both learners including apprentices, staff and associates.

The nominated **Designated Safeguarding Lead** ensures that safeguarding matters are central to the strategic management of S&A Academy Training. The **DSL** is an experienced and qualified practitioner. The role of the DSL is key in ensuring that operational safeguarding in the service-specific contexts is effective. The DSL will also ensure that local delivery staff develop close working relationships with other agencies involved in safeguarding arrangements in order that they effectively monitor the safety of the children and young people that S&A Academy Training works with.

The DSL will ensure all concerns raised are recorded, and support any referrals to Local Safeguarding Partners or the Police if necessary. Any member of staff or anyone who has knowledge of, or a suspicion that a learner is or has been suffering significant harm, or is at risk of significant harm, should discuss their concern with their DSL and report the concern using the concern form.

The sharing of relevant information at the earliest opportunity within an environment of strict confidentiality is essential. All information from parents, members of the public and any of an anonymous nature must be acted upon and recorded appropriately.

- The DSL is responsible for ensuring the Safeguarding Policy is available publicly
- The DSL team will alert the DBS when a person has been dismissed or left due to risk to or harm that they presented, or may have presented, to a learner
- The DSLs are aware of how to make referrals to safeguarding partners via the local authority multi-agency safeguarding units, along with the role they might be expected to play in such assessments
- The DSL team will alert the police when a crime may have been committed
- The DSL fosters strong links with Safeguarding Partners and Designated Local Authority Persons
- The DSL team refer all cases of suspected abuse to the relevant local authority team.
- If it is agreed that the issue puts the learner at immediate risk of significant harm it will be reported immediately to the Police
- The DSL team will refer to the ESFA or Local Authority as required should we be subject to an investigation regarding our safeguarding practices
- The learner should be kept informed of actions taken at all stages of the procedure and maximum support offered/provided to them. Where the learner is competent to give consent, their agreement to the referral should be sought
- If consent is refused the referral should still be made if it is considered necessary to protect the learner from significant harm
- A written report of all discussions and actions is recorded, and all referrals and subsequent documents/files retained securely by the DSL in the Safeguarding Log
- All DSLs liaise with senior management to inform them of issues, especially ongoing enquiries, and police investigations

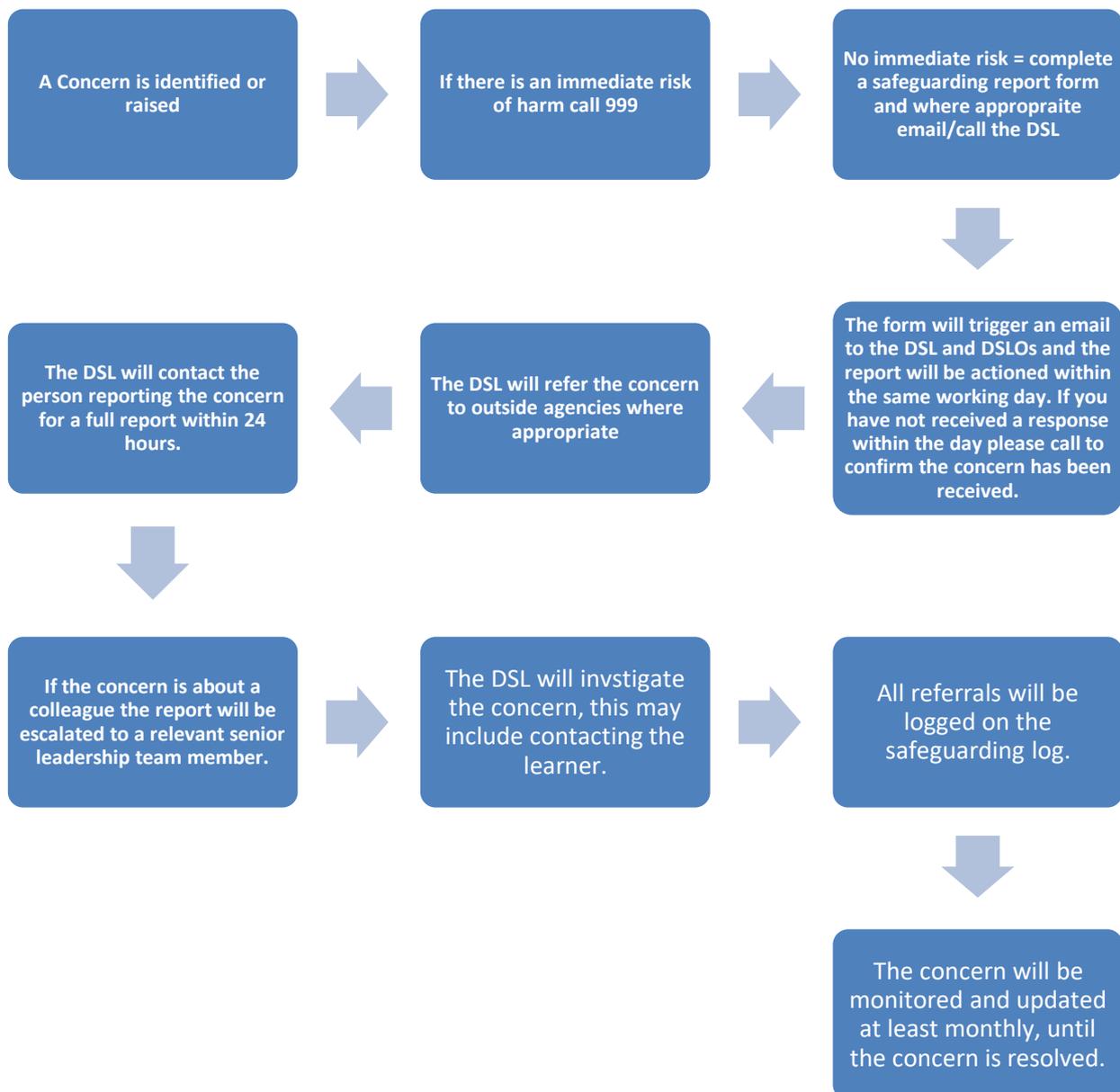
The nominated **Designated Safeguarding Lead** ensures that safeguarding matters are central to the strategic management of The S&A Academy. The **DSL** is an experienced and qualified practitioner. The role of the DSL is key in ensuring that operational safeguarding in the service-specific contexts is effective. The DSL will also ensure that local delivery staff develop close working relationships with other agencies involved in safeguarding arrangements in order that they effectively monitor the safety of the children and young people that The S&A Academy works with.

The DSL must be informed immediately in the following circumstances if:

- a) Suspicion that a learner is being harmed
- b) There is evidence that a learner is being harmed

### **Reporting a concern:**

S&A staff are trained to follow the process as set out in this policy and the staff handbook:



### Staff responsibilities:

- Listen to the learner
- Never promise a learner you will keep a secret, explain that if they tell you something you think may put them at risk of harm you will have to tell someone who can help keep them safe
- Encourage the learner to talk, but do not prompt, or put words into their mouths, and do not ask leading questions
- Do not ask the learner to repeat again and again
- Explain what action you must take in a way that is age appropriate
- As soon as you are able, write down what the learner has told you. Use the learner's exact words if possible. Record the date, time and place and any other people present at the time
- Report concerns without delay to the DSL
- Do not worry you may be mistaken; it is better to discuss your concerns with someone who has the experience and the responsibility to make an assessment

- Do not confront an alleged abuser
- Try to remain calm and not to appear shocked by what they are telling you;
- Attend safeguarding and child protection training and updates as required, on induction and an update at least once every year
- Reading and familiarising themselves with associated policies via the LCG website
- Promoting awareness of safeguarding issues/support amongst learners, colleagues, and other stakeholders
- Wearing their staff ID badge when meeting with learners

### **Learner responsibilities:**

- Maintaining vigilance and a pro-active approach to the safety and welfare of themselves, their peers, and others on site
- Reporting any concerns to a member of staff or directly to a DSL with whom they feel comfortable discussing these concerns
- Abiding by the learner code of conduct which is designed to safeguard all those on our sites or using our facilities, including the IT network
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature

### **Employer Responsibilities**

- To understand what is meant by safeguarding and promote the welfare of learners
- Be aware of your statutory duties towards the welfare of children and vulnerable adults
- Be familiar with our guidance, in particular, the reporting arrangements
- It is the responsibility of the employer to ensure employees working alongside learners are free from convictions and of sound character and judgement and will not pose as any threat or danger to learners.

Employees working closely with children or vulnerable learners should be alert to the possibilities of harm and they should inform only—and not investigate or offer advice. If any member of staff has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and contact the Designated Safeguarding Team.

Any concern must be documented and emailed to the Designated Safeguarding Lead. Unless in immediate harm, where the relevant authorities will be contacted immediately.

If you have any concerns about an apprentice, then please do not hesitate to contact one of S&A Academy Training designated safeguarding lead/ deputy in the absence of the Lead.

Designated Safeguarding Lead job description:

[https://www.keepingchildrensafeineducation.co.uk/annex\\_c.html](https://www.keepingchildrensafeineducation.co.uk/annex_c.html)

Every member of staff or volunteer has a responsibility for ensuring that learners are safeguarded while they are using S&A Academy Training services.

S&A Academy organisational safeguarding standards recognise that we safeguard in a wide range of contexts with a diverse group of learners. Therefore, managing the risk to learners in these contexts can require different sets of knowledge and skills, and different responses, some of which are driven by statute and legislation.

Our safeguarding standards and behaviours seek to underpin safeguarding in all of our practice and are derived from section 11 of the Children Act (2004) and the Care Act (2014) as well as best practice guidance such as “Working Together to Safeguarding Children”

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

*Line Management:* every staff member must ensure that disclosures are reported to the DSL immediately. In consultation with the staff member, the DSL will decide as to whether a referral is necessary/ will take place.

**All reported disclosures regardless of outcome must also be reported internally within S&A Academy Training through the completion of the ‘Safeguarding Incident form’ which can be found on sharepoint** in conjunction with the written referral to the appropriate local authority safeguarding team.

The form is an online form and requires an outline of the basic details of the referral and the details of the incident being reported.

The form submission will notify the DSL who will act upon the referral within 48 hours. The DSL will update the safeguarding log and refer to the relevant external bodies where appropriate.

**Ensure Contract compliance to report all Safeguarding concerns- please ensure contract compliance at all times.**

What are the responsibilities of an Employer?

- To understand what is meant by safeguarding and promote the welfare of learners
- Be aware of your statutory duties towards the welfare of children and vulnerable adults
- Be familiar with our guidance, in particular, the reporting arrangements

It is the responsibility of the employer to ensure employees working alongside learners are free from convictions and of sound character and judgement and will not pose as any threat or danger to learners.

What do I do if my learner discloses information to me?

- Re-assure the learner that they have done the right thing
- Record what the learner said, using theirs words where possible. Sign and date the record

- Inform our Designated Person or deputy as soon as possible and pass on the written record
- Maintain confidentiality and do not discuss with others
- Listen without making judgements
- Stay calm
- Try not to ask questions, but if you must, make sure they are open-ended questions to clarify
- understanding and not to probe or investigate
- Don't give an opinion or offer advice
- Don't promise confidentiality - explain you may need to talk to a DSL

Employees working closely with children or vulnerable learners should be alert to the possibilities of harm and they should inform only—and not investigate or offer advice. If any member of staff has a safeguarding issue brought to their attention, they must treat it as a matter of urgency and contact the Designated Safeguarding Team. Any concern must be documented and emailed to the Designated Safeguarding Lead. Unless in immediate harm, where the relevant authorities will be contacted immediately.

In this situation ensure that the learner is accompanied and kept safe until the relevant authorities arrive.

If you have any concerns about an apprentice, then please do not hesitate to contact one of S&A Academy Training designated safeguarding lead/ deputy in the absence of the Lead.

### **9. Honour-based violence which includes FGM and forced marriage.**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. <https://www.gov.uk/female-genital-mutilation-helpadvice>

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her

- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

If you think you are dealing with such a case, it is a mandatory requirement to inform your designated safeguarding lead, as soon as practicable.

It is recommended that you make a report using the safeguarding report [form](#) here or calling 0204 551 1997 option 6. You should record the following information.

- Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work
- Details of your organisation's designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work
- The girl's details: name, age/date of birth, address

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM. The DSL will then record an details of any safeguarding actions which were taken, and if appropriate report the case to the local authority and police (including the case reference number).

Forced marriage is an abuse of human rights, a form of violence against women and men, where it affects children, child abuse and where it affects those with disabilities abuse of vulnerable people. A forced marriage is one in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities or mental

incapacity, cannot) consent to the marriage and violence, threats, or any other form of coercion is involved. Coercion may include emotional force, physical force or the threat of physical force, and, financial pressure. In an arranged marriage, both parties have consented to the union but can still refuse to marry if they choose to.

*FGM and forced marriage are child abuse, and employers and the professional regulators are expected to pay due regard to the seriousness of breaches of the duty.*

<https://www.gov.uk/guidance/forced-marriage>

## **10. Grooming- What does the term grooming mean?**

- Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences
- Grooming is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks
- You will probably associate grooming with children, and predominantly this is what you will hear and see in the media on the subject, but it does also affect vulnerable adults

*What is sexual online grooming?*

- Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms to do so
- The person carrying out the online grooming will try to establish the likelihood of the child telling someone. They will also find out as much as they can on the child's family and social networks
- Online groomers will tend to use chatrooms, which are focused on young people. There are countless teen chat rooms on the internet
- Those carrying out the grooming will pretend to be a child themselves, similar in age to the person they are grooming. They will even change their gender to make it easier to befriend the person they are grooming
- Grooming online is anonymous and children find it easier to trust an online 'friend' than
- someone they have met 'face to face'

How do you know if a child is being groomed online?

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit

- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know ➤ Becoming emotionally volatile

### Grooming – In Person

- Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adults' trust
- They may try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult

### **Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues**

To gain trust, groomers will:

- Pretend to be someone they are not, for example saying they are the same age online
- Offer advice or understanding
- Buy gifts
- Give the child or vulnerable adult attention
- Use their professional position or reputation
- Take them on trips, outings or holidays

Children or vulnerable adults may not speak out about their situation because they:

- Feel ashamed
- Feel guilty
- Are unaware that they are being abused
- Believe they are in a relationship with a 'boyfriend' or 'girlfriend'

## **11. Contextualised Safeguarding**

KCSiE -'All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their

families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.'

## **12. County lines drug trafficking**

In the United Kingdom, county lines drug trafficking is the practice of trafficking drugs into rural areas and smaller towns, away from major cities. Traffickers recruit vulnerable children, including children in pupil referral units who have been excluded from school, as drug dealers. Some young people are recruited via "debt bondage", whereby they enter county lines to pay off drug debts. Others take part of their own volition, owing to boredom and a lack of legitimate opportunity.

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerableadultscounty-lines>

<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drugtrafficking/countylines#:~:text=County%20Lines%20is%20where%20illegal%20drugs%20are%20transported,people%20who%20are%20coerced%20into%20it%20by%20gangs.>

## **13. Mental Health**

Education providers have an important role in supporting the mental health and wellbeing of learners. Recognising that in some cases mental health is an indicator of a child suffering or at risk of abuse.

KCSiE guidance is to help staff connect mental health concerns with safeguarding. 'All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.' This also applies to vulnerable adults.

Resources to support Mental Health include:

- MindEd, which includes e-learning modules about young people's mental health
- the Every Mind Matters platform, which has specific advice for adults and young people on maintaining good mental wellbeing during the coronavirus (COVID-19) pandemic
- the Association of College's (AoC) coronavirus (COVID-19) resource hub, which includes advice for students and staff
- the Education and Training Foundation's mental health and emotional wellbeing advice for FE staff
- Education Support's mental health and wellbeing support services for all education staff
- free apps available on the NHS App Store for mental health and wellbeing support
- Digital Wellbeing of Students guide from Jisc, which curates a number of resources

and guides • the Samaritans' website provides guidance on how to prepare for and respond to a suspected suicide in FE.

Consider supporting learners with their mental health and wellbeing through:

- remote one to one counselling
- encouraging young people to identify their own self-care strategies during this uncertain time, online resources can help with this
- completing welfare checks at the start of each lesson to ensure that all students are engaged and supported
- personal, social, health and economic (PHSE) lessons focused on topics including mental health awareness, healthy living and online safety
- encouraging participation in sport, AOC Sport promotes and supports sports in further education.

#### **14. Internet Safety, IT, Cyber Security and virtual lessons (also see our I.T User and E- Safety Policy)**

The internet is used in S&A Academy Training to raise educational standards, to promote learner achievement, to support the professional work of staff and to enhance our management functions. Technology is advancing rapidly and is now a huge part of everyday life, education and business. We want to equip our learners with all the necessary I.T skills that they will need in order to enable them to progress confidently in their educational careers and onward towards their working environments when they leave education.

It is mandatory to hold the Cyber Essentials certificate to access any delivery funding.

Learn more:

[www.esfa-cyber-essentials.com](http://www.esfa-cyber-essentials.com)

#### *Safeguarding students and tutors online*

Some learners are being educated at home during the coronavirus (COVID-19) outbreak, so leaders and teachers are having to adjust to remote education strategies. While this is happening, it is important that we continue to follow safeguarding procedures -online education should follow the same principles set out in our staff behaviour policy (sometimes known as a code of conduct). Keeping teachers safe when providing remote education is also essential.

Remote education is a new experience for both staff and learners, so it's important that schools and colleges understand how to approach safeguarding procedures online.

<https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

<https://www.gov.uk/government/publications/online-safety-in-schools-and-colleges-questionsfrom-the-governing-board>

It is important that staff and volunteers are alert to potential risks vulnerable people may be exposed to, and that steps have been taken to mitigate the risk of this occurring, with specific reference to:

*Content* – e.g. exposure to age inappropriate material, inaccurate or misleading information, socially unacceptable material (e.g. inciting violence, hate or intolerance) and illegal material (including images of child abuse);

*Contact* – e.g. grooming using communication technologies leading to inappropriate behaviour or abuse;

*Commerce* – e.g. exposure to inappropriate advertising, online gambling, identity theft and financial scams;

*Culture* – e.g. bullying via websites, mobile phones or other communication technologies, or inappropriate downloading of copyright materials (i.e. music, films, images); exposure to inappropriate advertising, online gambling and financial scams

*Social Media* – e.g. Twitter, Instagram, Facebook, and other social media sites can also include and be used for bullying, coercion and grooming and as a point of exposure for extremism, sexual misconduct and scamming (e.g. financial schemes)

*Phishing*- the fraudulent practice of sending emails purporting to be from reputable companies in order to induce individuals to reveal personal information, such as passwords and credit card numbers.

"an email that is likely a phishing scam"

Addressing these issues through training for staff and volunteers, and awareness raising with service users, or members of the community, will be undertaken by the Company. If there is any indication that a vulnerable person is experiencing difficulties in this area (for instance if they are reported to be spending long periods of time using a PC on their own or if they appear unnecessarily defensive, secretive or anxious about their PC use), then this must be taken seriously. We have actively improved our on line safety training and education throughout the pandemic to include education and training, monitoring of I.T usage to ensure the safety of all stakeholders, as well as use of appropriate firewalls.

#### *Monitoring I.T usage*

There are circumstances where S&A Academy Training may monitor or record communications made using its computer and telecommunication systems, or examine material stored on those systems.

This document includes our policy in respect of such activity. It is important to be aware of the distinction made between:

- intercepting information in transit - email messages being sent, for example, or watching the web pages visited - here the relevant law is found in the Regulation of Investigatory Powers

Act 2000 (RIPA) and the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (LBPR);

- examination of material stored on a computer - the law applicable here may vary according to variables such as who owns the computer, what material is being examined, and how the material is examined.

The part of this policy covering the interception of information applies to any communication on or through our computer systems - the latter term being taken to include all components of the network as well as the computers (whether or not they are owned, attached to it).

This policy concerned with the examination of stored material applies to any computer facility provided by S&A Academy Training.

S&A Academy Training recognises that it has a duty under Section 26 of the Counter-Terrorism and Security Act (2015) to have due regard to the need to prevent people from being drawn into terrorism and to promote and safeguard the welfare of children and vulnerable adults (Education Act 2002, Working Together to Safeguard Children 2018 and KCSIE).

Managers are responsible for the well-being of the employees and learners and must ensure appropriate material only is accessible through its resources and networks. Any employees who feels someone is showing an interest in extremist, abusive or inappropriate material should report this to the Safeguarding Lead in the first instance. Any employees who believes learners have access to inappropriate material should report this.

All serious e-safety incidents will be logged. The M.D/ CEO has responsibility for the implementation and annual review of this policy and will consider the record of e-safety incidents and new technologies with the Safeguarding Lead, where appropriate, to consider whether existing security and e-safety practices and procedures are adequate.

Please see our separate I.T User and E- Safety Policy.

A copy of the I.T. user agreement within our I.T. policy can also be found in the Appendix within this policy.

#### *Virtual lessons and live streaming*

Should schools, colleges and work based learning providers choose to provide remote education using live streaming or pre-recorded videos, guidance from the National Cyber Security Centre (NCSC) on [which video conference service is right for your school](#) and [using video conferencing services securely](#) could help to set up video conferencing safely, if this is the chosen approach.

In addition, [guidance from the UK Safer Internet Centre on safe remote learning](#) includes detailed advice on live, online teaching.

Teaching and assessing from home is different to teaching in the classroom. Tutors/ Assessors should try to find a quiet or private room or area to talk to learners, parents or carers. When broadcasting a lesson or making a recording, consider what will be in the background.

*Cyber security* - how individuals and organisations reduce the risk of cyber-attack. Cyber security's core function is to protect the devices we all use (smartphones, laptops, tablets and computers), and the services we access - both online and at work - from theft or damage. It is also about preventing unauthorised access to the vast amounts of personal information we store on these devices, and online.

Cyber security is important because smartphones, computers and the internet are now such a fundamental part of modern life, that it's difficult to imagine how we'd function without them. From online banking and shopping, to email and social media, it's more important than ever to take steps that can prevent cyber criminals getting hold of our accounts, data, and devices.

Cybercriminals don't care that the world is going through a Pandemic- the risk and likelihood of a Cyberattack during these times has never been higher.

Action Fraud is the UK's national reporting centre for fraud and cybercrime and monitors and investigates cyberattacks. They have reported a 400% increase in reported cyberattacks, including phishing attacks on hospitals during Covid.

Cyber criminals exploit weaknesses in software and apps to access your sensitive personal data, but providers are continually working to keep you secure by releasing regular updates. These updates fix weaknesses, so criminals can't access your data. Using the latest versions of software, apps and operating system on your phone, tablet, or [smart device](#) can immediately improve your security. Remember to update regularly, or set your phone, tablet or [smart device](#) to automatically update so you don't have to think about it. Ensure all devices are running Malware and Anti-virus software, change passwords regularly and don't share these or input passwords in public places, ensure you reduce Permissions to a 'Need'

## 15. Bullying, Cyberbullying and Harassment

At S&A Academy, we are committed to providing a safe, inclusive, and respectful environment for all learners. Bullying in any form is not tolerated, and the academy takes a proactive approach to prevent and address bullying behavior. This policy outlines the steps we take to tackle bullying concerns to ensure a positive learning experience for every learner.

### Definition of Bullying

Bullying is defined as behavior that is:

- **Intentional** and aimed to hurt, harm, or intimidate another individual or group.
- **Repeated** over time, rather than isolated incidents.
- **Imbalanced in power**, where the person(s) doing the bullying has more power (physical strength, access to information, social influence, etc.) than the target.

This may include:

- **Physical** (hitting, pushing, damaging belongings)
- **Verbal** (name-calling, threats, offensive comments)
- **Emotional** (exclusion, spreading rumors, manipulation)
- **Cyberbullying** (using technology to harm, intimidate, or embarrass)

### **Aims**

- To prevent bullying through education, awareness, and fostering a culture of respect.
- To address and resolve bullying concerns quickly and effectively.
- To ensure that all learners feel safe and supported within the academy.
- To promote open communication where learners feel confident to report bullying.

### **Responsibilities**

#### **Learners**

- Treat others with kindness, respect, and inclusion.
- Report any bullying incidents they witness or experience.
- Support peers who may be targets of bullying.

#### **Teachers and Staff**

- Monitor learner behavior and promote a positive, respectful environment.
- Respond promptly to reports of bullying.
- Educate learners about the importance of respect, kindness, and the impact of bullying.
- Provide support to both the victim and the perpetrator, aiming for a resolution that benefits all parties.

#### **Parents/Guardians (for children and vulnerable adults)**

- Encourage open dialogue with their children about their school experience.
- Report any concerns about bullying to the academy.
- Support their child in resolving any bullying issues in partnership with the academy.

### **Reporting Bullying**

Learners, parents, or staff members can report bullying through:

Directly speaking to a tutor or staff member or emailing [safeguarding@sandaacademy.ac.uk](mailto:safeguarding@sandaacademy.ac.uk)

### **Procedure**

#### **Initial Report**

All reports of bullying are taken seriously and will be investigated promptly.

#### **Investigation**

The designated safeguarding lead will gather information from all parties involved to understand the situation.

Confidentiality will be maintained where appropriate, but some details may need to be shared to ensure a fair investigation.

### **Action**

Appropriate actions will be taken based on the outcome of the investigation. This may include:

- Mediation between the parties involved (if deemed appropriate)
- Disciplinary action against the bully, if required.
- Support for the victim, which may include counseling, mentoring, or additional safeguarding measures.

### **Follow-Up**

Regular follow-up will occur to ensure the bullying does not continue.

The academy will maintain open communication with the learners and their families to ensure long-term resolution.

### **Prevention Measures**

Anti-bullying campaigns and workshops integrated into the curriculum.

Promoting a culture of kindness and inclusivity through positive role modeling by staff.

### **Consequences of Bullying**

S&A Academy takes bullying seriously. Consequences for bullying behavior can range from a verbal warning to more serious actions such as suspension or expulsion, depending on the severity of the situation.

Cyberbullying involves the use of electronic communication devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs.

Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications.

*Who is most at risk?*

- Children using social media unsupervised
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse

## 16. Sexual Harassment, including consent, upskirting (is now a form of peer-on-peer abuse in KCSiE 2020), Sexting and healthy relationships.

S&A Academy is dedicated to promoting the well-being, safety, and respectful interactions of all learners. This policy provides guidance on sexual consent and the promotion of healthy relationships, aiming to foster an environment where everyone understands their rights and responsibilities in relationships. The academy promotes mutual respect, communication, and informed decision-making to support a positive, safe, and inclusive learning community.

### Key Definitions

- **Sexual Consent**

Consent is the voluntary, informed, and enthusiastic agreement between individuals to engage in sexual activity. It must be given freely and can be withdrawn at any time. Consent cannot be obtained through force, coercion, manipulation, or if a person is incapacitated (due to drugs, alcohol, or unconsciousness).

- **Healthy Relationships**

Healthy relationships are based on mutual respect, trust, communication, and equality. These relationships are free from violence, coercion, or manipulation, and support the emotional and physical well-being of both individuals involved.

- **Upskirting**

Upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

It's a criminal offence to create or share explicit images of a child, even if the person doing it is a child. <https://learning.nspcc.org.uk/research-resources/briefings/sexting-advice-professionals>

### Core Principles

1. **Respect and Equality**

All relationships at S&A Academy, whether between learners or between staff and learners, must be based on respect, trust, and equality. Individuals must respect each other's boundaries, autonomy, and decisions. Staff should empower apprentices to uphold their boundaries and educate them in relation to what healthy relationships look like. The information below is provided to help staff and students understand what this looks like.

2. **Voluntary and Informed Consent**

Sexual consent must be:

- **Freely given:** No one should feel pressured or coerced into sexual activity.
- **Informed:** Both parties should understand what they are consenting to.
- **Specific:** Consent for one activity does not imply consent for another.
- **Reversible:** Consent can be withdrawn at any point, and all activity must stop if this happens.

Consent should be an ongoing process, with clear and open communication between the individuals involved.

### 3. Healthy Relationship Characteristics

A healthy relationship may include examples of the following:

- **Open communication:** Partners feel comfortable discussing their feelings, expectations, and boundaries.
- **Mutual respect:** Both individuals respect each other's opinions, privacy, and individuality.
- **Trust:** There is no place for suspicion or jealousy.
- **Support:** Partners encourage each other's growth and well-being.
- **Equality:** Neither partner exerts power or control over the other.

### 4. Unhealthy Relationships

Unhealthy relationships may involve behaviors such as:

- **Control or manipulation:** One partner dominates decision-making or controls aspects of the other's life.
- **Emotional or physical abuse:** Any form of violence, threats, or insults.
- **Pressure or coercion:** Being forced or manipulated into activities, including sexual activity, against one's will.
- **Isolation:** Preventing someone from seeing friends or family, or isolating them from support networks.

#### Staff Responsibilities

- Promote education on sexual consent, healthy relationships, and respectful interactions through curriculum and workshops.
- Foster an environment of safety and support where learners feel comfortable reporting issues.
- Respond promptly and effectively to any reports of sexual misconduct, unhealthy relationships, or violations of consent.

### Reporting and Support

#### 1. Reporting Sexual Misconduct or Relationship Concerns

- If staff, employers or learners are concerned for an apprentice in relation to sexual harassment this should be immediately reported to the DSL using the safeguarding process referred to in APPENDIX B or emailing [safeguarding@sandaacademy.ac.uk](mailto:safeguarding@sandaacademy.ac.uk) or telephoning **020 458 30803 / 020 4551 1997**
- All reports will be taken seriously and investigated promptly, ensuring confidentiality and support for the individuals involved.
- 

#### 2. Support for Learners

- The academy will provide emotional, psychological, and practical support to any learner who has experienced sexual misconduct or relationship abuse. This may include counseling services, academic accommodations, and referral to external support agencies.
- The academy will also offer guidance and support to those who may be struggling with maintaining healthy relationships.

## **Confidentiality**

All reports of sexual misconduct or relationship issues will be handled with the utmost confidentiality. Information will only be shared on a need-to-know basis to ensure the safety and well-being of the learner(s) involved. Where legal obligations arise, such as in cases of criminal activity, the academy will comply with legal reporting requirements to local authorities.

### **17. Child exploitation**

These are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Save the Children states child exploitation refers to the “use of children for someone else’s advantage, gratification or profit” often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child’s physical or mental health, education, moral or socialemotional development.

[Child exploitation disruption toolkit - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

### **18. Serious violent crime**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school/ college, a change in friendship or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children and vulnerable have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults.

### **19. Risk Assessment (see Health and Safety Policy for further detail)**

The company uses risk assessment to inform the planning of safeguarding activities. This takes place at a number of levels:

- Cross company risk register – explicit section on Safeguarding
- Staff safeguarding risk assessment – considering safeguarding measures to be put in place for various groups of staff
- Hazardous activity risk assessments – in line with the company health and safety policy
- Individual learner risk assessments – where the needs or circumstances of the individual dictate that completion of a risk assessment would be beneficial

Risk assessment are reviewed and updated on a regular basis as needs demands and at least once every year.

## **20. Raising Awareness of Safeguarding Procedures and mitigation of risk**

It is important that all members of the company recognise the role they play in safeguarding. All staff, volunteers and contractors, if relevant, are trained in and receive regular updates in esafety and recognising and reporting concerns.

We will abide by Government guidance relating to learners safety and measures that need to be taken to minimise the risk of infection during pandemics. We will be vigilant to the mental health and wellbeing of learners during the time of any isolation and provide a support plan for regular contact where attendance is not a normal indicator of engagement. Learners will also be provided with guidance on safe home working/ learning. See our Covid Response Plan.

An external speaker or visitor is used to describe any individual or organisation who is not a member of staff or learner working with us, or one of its contracted partners, who has been invited to speak to staff/learners. It is paramount that Safeguarding measures are in place including ensuring a reasonable notice period for checks to be made.

Our policies recognise that Internet Safety is a whole team/organisation responsibility which includes learners and their parents and carers. Apprentices including adults at risk may expose themselves to danger, whether knowingly or unknowingly, when using the Internet and other technologies. We therefore recognise our responsibility to educate all learners, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the Internet and related technologies. These issues are addressed within the learner journey, within relevant policies and procedures and with parents and carers for under 18's.

We will ensure filters are in place to prevent access to unsuitable sites and we will monitor and report monthly on the use of the network and internet to ensure that any learner, staff, associate, volunteer or contractor attempting to access inappropriate, harmful or indecent images are found, then the police will be informed immediately and we will fully support their investigation. If involving a staff member/volunteer, immediate suspension, in line with the disciplinary process, will immediately take effect and the managing safeguarding and prevent allegations procedure may need to be instigated by the DSL. We will take the police advice when learners are involved as to whether the relevant commissioner should be informed.

Photographs- the welfare and protection of our children and adults at risk is paramount and consideration should always be given as to whether the use of photography will place them at risk. Images may be used to harm children or adults at risk, for example as a preliminary to grooming or by displaying them inappropriately on the internet, particularly social networking sites. For this reason, consent must be sought from those with parental responsibilities (this may include the Local Authority in the case of looked after children)

Recording of learner assessment is in line with awarding body regulation.

We are aware of the Safeguarding Partners escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults.

Safeguarding must be a topic covered within the induction of every member of the company community whether they are learners, staff or employers used by the company for work experience purposes.

**Learners:** Within the induction programme learners will be made aware of the following:

- What constitutes abuse under Safeguarding, including risks from remote/ on line learning
- The reporting procedures for self-referral or reporting suspected abuse of a friend or colleague
- To whom the referral should be made
- The responsibility each learner has for another

**Staff:** Within the staff Induction programme employees will be made aware of the following:

- The procedure for reporting issues associated with safeguarding including risks from remote/ on line learning
- The key company personnel to whom the report should be made
- The responsibility of members of staff under the Safeguarding Policy and other associated policies
- Newly appointed staff will have a job role induction (JRI) in line with the our Probation policy over a 6-month period. A robust induction into the safeguarding of children, young people and adults at risk procedures is provided when they join the organisation, this includes mandatory reading of the internal and external policies and legislation.
- All new staff will complete Child Protection and Vulnerable Adult Awareness training

As well as during induction the following is implemented:

- ✓ Policy will be reviewed annually or sooner if changes in legislation occur
- ✓ Safeguarding refresher training also completed annually for all staff
- ✓ Each learners' journey and learner surveys will incorporate the Safeguarding and Prevent agenda
- ✓ Learner reviews will incorporate both Safeguarding and Prevent agenda (with employers present)
- ✓ Staff and SLT meetings will have Safeguarding and Prevent on the agenda as mandatory

- ✓ Staff supervision meetings will have Safeguarding and Prevent on the agenda as mandatory

**Employers:** Any employer working with a learner must be given training on the S&A Academy Training Safeguarding Policy and Procedures by the learner's Tutor or nominated representative prior to the learner embarking upon the experience or placement. The Tutor and employer must:

- Identify a key employee who will act as the main contact for the learner on experience or placement for the purposes of child protection
- Instruct that key employee on the company's Safeguarding policy and Procedures and identify who their key point of contact is within company for any referrals for suspected abuse under Safeguarding
- Sign a declaration that appropriate training has taken place and that the employee is fully aware of their responsibility and the reporting process (appropriate notes and procedures will be left with the employee for reference purposes).

#### Keeping Yourself Safe- Safeguarding Code of Conduct

You will naturally build a rapport with learners/ apprentices and they may see you as a confident and support but be sure to maintain professional boundaries whenever carrying out work on S&A Academy Training 's behalf. Be respectful and appreciate you are in a position of trust. Uphold confidentiality within certain remits when required by the situation, but be careful not to promise to keep secrets or ask others to do so.

### 21. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

**Note 1:** Promises of confidentiality must not be given as the matter may develop in such a way that these promises cannot be honoured.

**Note 2: Learning Difficulties and / or Disabilities:** Some people with learning difficulties and / or disabilities may need different treatment to other persons e.g. in the way their physical/mental condition might mask possible abuse.

**Note 3: Forced Marriage:** If there are concerns that a vulnerable person (male or female) is in danger of a forced marriage, you should contact the company nominee for safeguarding who will contact the Forced Marriage Unit (FMU) (020 7008 0151) or by visiting the [FMU page](#) of the Foreign and Commonwealth Office website. The police and Children's Services will also be contacted. You can also call 101 for advice and guidance.

If the complainant is the person being abused, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. The use of leading questions can cause problems for the subsequent investigation and any court proceedings.

A full record shall be made as soon as possible of the nature of the allegation and any other relevant information including:

- ✓ the date
- ✓ the time
- ✓ the place where the alleged abuse happened
- ✓ your name and the names of others present
- ✓ the name of the complainant and, where different, the name of the young person who has allegedly been abused
- ✓ the nature of the alleged abuse
- ✓ a description of any injuries observed
- ✓ an account of the allegation that should be signed and dated by the person completing the report

Any suspicion, allegation or incident of abuse must be reported to the DSL (or deputy DSL in their absence) as soon as possible and at least within two hours.

The DSL shall telephone and report all allegations and incidents of abuse to either the Children Services department duty social worker, or the adult safeguarding duty team before the end of the company day. A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant department within 24 hours.

The DSL should discuss with the social services department what action will be taken to inform the parents of the young person and a note of that conversation should be made.

If the DSL cannot be contacted within 2 hours of the allegation or observation, the person making the report must notify the local Children Services department of the issue and inform the company's nominated member of staff, as soon as possible, about the action taken.

The nominated member of staff must notify the COO/ CEO of any allegation or incident as soon as is practicable and in any event within 24 hours of the initial concern arising.

*Written records.*

The DSL shall retain a copy of:

- ✓ The report
- ✓ Any notes, memoranda or other correspondence dealing with the matter
- ✓ Any other relevant material

Copies of reports, notes etc. should be kept securely locked at all times. Ensure Data Protection compliance.

## **22. Reporting and Dealing with Allegations of Abuse against Members of Staff**

Where an allegation of abuse is made, and it involves a member of Company staff the Company will comply at all times with guidance Safeguarding Children in Education: Dealing with Allegations of Abuse Against Teachers and Other Staff.

[Allegations of abuse against teachers and non-teaching staff - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/allegations-of-abuse-against-teachers-and-non-teaching-staff)

Allegations against a staff member who is no longer teaching or employed by S&A Academy Training should be referred to the police. Historical allegations of abuse should also be referred to the police.

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Allegations against staff should be reported to the CEO. The CEO will then consult with the DSL. The CEO may delegate the task to the COO who will inform the accused person.

Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children/ vulnerable adults at college or whether alternative arrangements can be put in place until the allegation or concern is resolved.

Any suspicion, allegation or actual abuse of a young person by a member of staff must be reported to the nominated member of staff as soon as possible and at least within two hours. If within 2 hours of the initial concern it has not been possible to contact the nominated member of staff the matter must be reported to the CEO.

Full records must be made about the alleged incident/s as described above.

Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of under 18's or vulnerable adult involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

The Company will, as deemed appropriate through the investigation, co-operate fully with the Police, Social Services and other external organisations in the execution of their duties within the investigation.

The CEO/ COO with senior responsibility for Safeguarding will be kept informed of any situation where the investigation of an alleged incident under the Safeguarding Policy and Procedure is necessary.

Parents or carers of a young person or vulnerable adult involved should be told about the allegation as soon as possible if they do not already know of it (subject to discussion with the relevant authority). They should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

If the designated safeguarding lead is the subject of the allegation or complaint, the matter must be reported directly to the CEO/ COO.

### **23. Confidentiality**

It is extremely important that when an allegation is made, that providers make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Parents and carers of under 18's should also be made aware of the requirement to maintain confidentiality about any allegations made against staff or stakeholders whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraphs 213-214). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

KCSiE identifies GDPR and withholding information:

'Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.'

### **24. Safer Recruitment and Selection (see our Safer Recruitment Policy)**

The Company pays full regard to safer recruitment processes and best practice: <https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>

We ensure that all appropriate measures are applied in relation to everyone who works in the Company e.g. volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining references satisfactory to the Company, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes

undertaking interviews, reference checks and undertaking Disclosure and Barring Service (DBS) checks and ensuring staff are registered on the updating service.

No new member of staff is to be employed without an enhanced DBS check.

Statutory changes, underpinned by regulations, are that:

- ✓ A DBS Enhanced Disclosure is obtained for **all** new appointments to the Company's workforce.
- ✓ The Company will keep a single central record detailing a range of checks carried out on staff.
- ✓ All new appointments to the Company workforce who have lived outside the UK are subject to additional checks as appropriate.
- ✓ The Company will satisfy itself that supply/temporary staff have undergone the necessary checks.
- ✓ Identity checks must be carried out on all appointments to the workforce before the appointment is made.

*Single Central Record*- the Company maintains a single central record of all checks on Company staff and, where appropriate, governors, volunteers and other people who may come into routine contact with vulnerable learners through the course of their studies.

## **25. Monitoring and Review**

This policy will be reviewed as deemed necessary through changes in law and/or good practice but at least annually.

## **26. Data Protection (please also see Data Protection policy for further detail)**

In deciding what information to disclose, careful consideration should be given to the provisions of the Data Protection Act 2018, the law of confidence and, where relevant, the Human Rights Act 1998.

- Be clear
- Ensure you include the key details of the learner and any required description about them in the account
- Be accurate
- Be concise
- Record only relevant information to this report. Ensure that you are clear what is a fact and what is your opinion

- You may need to offer some analysis – in this circumstance you need to be clear about why you are worried? What is the likelihood and possible impact should the risk occur?

*What happens to the recording of the disclosure and other information gathered?*

Apart from forming the basis for the referral, it may also be used in court reports (civil and criminal) and in statutory safeguarding processes such as investigation and assessments and child protection conferences. Internally, the S&A Academy Training reporting process includes the requirement of an update on the Safeguarding Incident form (part 3) within 7 days of the disclosure which includes review of best practice.

## **27. Whistleblowing and Complaints (please also see associate policies)**

*“What do I do if I am worried that another member of staff is acting in a way that may be unsuitable in practice, or may be causing harm to another person or even committing a criminal offence against another person?”*

Where an allegation is made against a staff member, either employed or associate, the matter is reported immediately to the CEO in line with this policy and KCSiE guidance. The CEO will inform the Director (s) as appropriate and the incident will be dealt with under S&A Academy Training Policy in line with KCSiE guidance.

Allegations of a safeguarding nature may constitute one or all of the below:

- A concern which may mean the employee is not suitable to practice with children, young people and vulnerable adults
- A concern which has led to the possible harm to a learner
- A safeguarding concern which may be criminal in its nature or intent

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them: The NSPCC’s dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **28. Safeguarding and Ofsted (Extract taken from the Inspection Handbook).**

As part of assessing safeguarding, inspectors will consider how colleges and providers<sup>[footnote 70]</sup> that have learners who are children<sup>[footnote 71]</sup> handle concerns about harmful sexual behaviour towards or between learners who are children and young people (including sexual harassment and violence and online sexual abuse). This includes considering whether the college or provider has followed the relevant DfE guidance about peer-on-peer abuse between

children, and whether:[\[footnote 72\]](#)

- the provider has appropriate provider-wide policies and procedures in place that make it clear that all harmful sexual behaviour is unacceptable and that assume that sexual harassment and online sexual abuse are happening in the provision, even when there are no specific reports
- the provider's policies are reflected in their curriculum,[\[footnote 73\]](#) which specifically addresses sexual harassment and violence, online sexual abuse and language and consent
- all staff are clear as to the provider's relevant policy and procedures, and this is supported by relevant training
- all learners are supported to report concerns about sexual harassment and violence and online sexual abuse
- concerns are taken seriously and dealt with swiftly and appropriately, and learners are confident that this is the case
- comprehensive records of concerns are kept
- the provider has taken into account the findings and recommendations of Ofsted's review of sexual abuse in schools and colleges[\[footnote 74\]](#)

276. Inspectors will also look at how providers work to prevent sexual harassment and violence and online sexual abuse between learners using a whole-provider approach that includes an effective behaviour policy, pastoral support and a carefully planned curriculum with respect to relationship and sex education. Inspectors will expect providers to be alert to factors that increase the vulnerability or potential vulnerability of learners, such as mental ill health, domestic abuse, children with additional needs, and learners from groups at greater risk of harm (including vulnerable adults). Inspectors will also seek to understand how any barriers that could prevent a learner from making a disclosure, for example communication needs, are identified and addressed.

277. As set out in '[Inspecting safeguarding in early years, education and skills settings](#)' inspectors will expect, among other things, providers to:

- understand how to handle reports of harmful sexual behaviour between learners, both on and outside college or provider premises, in line with the DfE's guidance,[\[footnote 75\]](#) and train their staff accordingly
- have good awareness of the signs that a child/young person who is a learner is being neglected or abused, as described in '[What to do if you're worried a child is being abused](#)'
- be confident about what to do if a learner reports that they have experienced sexual harassment, online sexual abuse or sexual violence involving another learner
- ensure that learners are taught about safeguarding risks, including online risks
- support learners to understand what constitutes a healthy relationship, both online and offline[\[footnote 76\]](#)

278. Inspectors will not investigate concerns of sexual harassment and violence and online sexual abuse themselves, but will ensure that allegations are reported to the appropriate authority as appropriate, where that has not already happened.

279. Where providers do not have effective policies and processes in place, it is likely that safeguarding will be considered ineffective. This is likely to impact on the leadership and management judgement. We will assess these arrangements in an age-appropriate way, taking account of the age and vulnerability of the learners involved. Inspectors may also, depending on the circumstances, take this evidence into account when considering the behaviour and attitude and personal development judgements (particularly in respect of learners feeling safe and pastoral support respectively).

#### *Sources of evidence specific to leadership and management*

280. Inspectors will gather a range of evidence from meetings with leaders, managers and governors and first-hand evidence of their work across the provider, including in subcontracted provision.

281. Inspectors will use documentary evidence that the provider supplies to evaluate the impact of the work of leaders, managers and governors, both currently and over time. They will use this in conjunction with first-hand evidence. This includes, but is not limited to:

- meetings with leaders and those responsible for governance, to evaluate how well they fulfil their statutory duties with respect to equality and safeguarding
- documentary evidence that demonstrates the effectiveness of the provision for all learners and its continuous and sustainable improvement
- interviews with staff and learners to evidence how well leaders have created a positive culture
- first-hand evidence gathered during the inspection
- responses to the staff, learner, employer and parent/carer questionnaires. These will be particularly useful for judging the culture that leaders and managers have established
- any evidence the provider has from surveying the staff and the way in which leaders and managers have responded to concerns raised by staff, parents or employers
- considering the overall aims of bodies giving strategic direction to providers on skills and economic needs, such as mayoral and combined authorities for devolved adult education
- records and analysis of safeguarding concerns, including those relating to sexual harassment and violence and online sexual abuse

## **29. Related policies**

There are other specific policies that have our approach to safeguarding embedded within them. These include:

**Appendix 1: I.T. Acceptable Use Agreement Version 1 For over 18s only** I understand that I must use S&A Academy Training systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users. **For my own personal safety:**

- I understand that S&A Academy Training will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will not disclose or share personal information about myself or others when online (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)

- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it online.

**I understand that everyone has equal rights to use technology as a resource and:**

- I understand that the systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the systems or devices for online gaming, online gambling, internet shopping, file sharing, or video broadcasting (e.g. YouTube) unless I have the permission of a member of staff to do so.

**I will act as I expect others to act toward me:**

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

**I recognise that S&A Academy Training has a responsibility to maintain the security and integrity of the technology it offers me**

- I will only use my own personal devices (mobile phones / USB devices etc) if I have permission and I understand that, if I do use my own devices, I will follow the rules set out in this agreement, in the same way as if I was using S&A Academy Training equipment.
- I understand the risks and will not upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software; however, this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person/organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any S&A Academy Training device, nor will I try to alter computer settings.
- I will only use social media sites with permission and at the times that are allowed

**When using the internet for research or recreation, I recognise that:**

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download copies (including music and videos)
- I understand that S&A Academy Training also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of education and where they involve my membership of the education community (examples would be cyber-bullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action.

**Please complete the section to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to systems and devices.**

I have read and understood the above and agree to follow the policy. Name

of learner: \_\_\_\_\_ Course: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**Appendix 2:**

**Parent / Carer I.T Acceptable Use Policy and Agreement version 1 For Under 18's only**

Digital technologies have become integral to the lives of children and young people, both within schools and work-based learning and outside. These technologies provide powerful tools, which open up new opportunities for everyone. They can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This acceptable use policy and agreement is intended to ensure:

- that S&A Academy Training as a duty of care to Safeguard learners
- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school, colleges and work-based learning and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their online behaviour

S&A Academy Training will ensure that *learners* will have good access to digital technologies to enhance their learning and will, in return, expect the *learners* to agree to be responsible users. A copy of the Learner Acceptable Use Policy is attached to this permission form so that parents/ carers will be aware of S&A Academy Training expectations of the young people in their care.

**Parents are requested to sign the permission form below to show their support of S&A Academy Training in this important aspect of learner safety.**

Parent / Carers Name: \_\_\_\_\_

Learner Name: \_\_\_\_\_

As the parent/carer of the above *learner*, I give permission for my son/daughter to have access to the internet and to ICT systems with S&A Academy Training .

*I know that my son/daughter will sign the Acceptable Use Agreement and has received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of education*

I understand that S&A Academy Training will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and systems. I also

understand that S&A Academy Training cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.

I understand that my son's / daughter's activity on the systems will be monitored and that S&A Academy Training will contact me if they have concerns about any possible breaches of the Acceptable Use Policy. I will ensure my child adopts the safe use of the internet and digital technologies at home and will inform S&A Academy Training if I have concerns over my child's online safety.

Signed: \_\_\_\_\_ Date: .....

### **Appendix 3**

#### **I.T. Acceptable Use Agreement**

##### **For learners under 18**

I understand that I must use S&A Academy Training systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users. **For my own**

##### **personal safety:**

- I understand that S&A Academy Training will monitor my use of the systems, devices and digital communications and have a responsibility to keep me safe under legislation including Keeping Children Safe in Education
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will not disclose or share personal information about myself or others when online (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- If I arrange to meet people off-line that I have communicated with online, I will do so in a public place.
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it online.

##### **I understand that everyone has equal rights to use technology as a resource and:**

- I understand that the systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the systems or devices for online gaming, online gambling, internet shopping, file sharing, or video broadcasting (e.g. YouTube) unless I have the permission of a member of staff to do so.

##### **I will act as I expect others to act toward me:**

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

**I recognise that S&A Academy Training has a responsibility to maintain the security and integrity of the technology it offers me**

- I will only use my own personal devices (mobile phones / USB devices etc) if I have permission, I understand that, if I do use my own devices, I will follow the rules set out in this agreement, in the same way as if I was using S&A Academy Training equipment.
- I understand the risks and will not upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software; however, this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person/organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any S&A Academy Training device, nor will I try to alter computer settings.

I will only use social media sites with permission and at the times that are allowed

**When using the internet for research or recreation, I recognise that:**

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

**I understand that I am responsible for my actions, both in and out of S&A Academy Training :**

- I understand that S&A Academy Training also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the education community (examples would be cyber-bullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action which may result in termination of my learning programme.

**Please complete the section to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to systems and devices.**

I have read and understood the above and agree to follow the Policy and Agreement

Name of learner: .....

Course: .....

Signed: .....

Date: .....

## Safeguarding Reporting Flowchart

### Safeguarding Disclosure Made

Reaffirm the boundaries of confidentiality. Inform the individual (if appropriate to age) that you have a duty of care, and the information will be passed on.

Record the facts as you know them, detailing the account given by the using their words as much as possible.

Discussion held with DSL to verify and discuss concern.

