

Safeguarding & Prevent Support Guide 2018–2019

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Introduction

This guidance supports the Skills4Stem Safeguarding Policy. All Skills4Stem staff, associates, volunteers and contractors must comply with the procedures set out in this document.

Skills4Stem's Safeguarding Policy and guidance applies to all our students and in particular students who are children (under the age of 18) or vulnerable adults. The key objectives of the policy and guidance are to:

- Promote a safe environment for all our students to learn and achieve.
- Actively promote the welfare of students.
- Identify any students who may be experiencing abuse or harm whilst in education and training, at work, at home or in relationships and take appropriate action to ensure their safety (Child and Adult Protection).

Skills4Stem is committed to safeguarding and promoting the welfare of students and expects all staff and volunteers and students to share this commitment.

This guidance is based upon the following legislation and guidance

- *Children Act 1989*
- *Children Act 2004*
- *Section 175 Education Act 2002*
- *Working Together to Safeguard Children 2015 (DCSF)*
- *Counter Terrorism & Security Act 2015*
- *Counter Extremism Strategy October 2015*
- *Serious Crime Act, Mandatory Reporting of Female Genital Mutilation, October 2015*
- *Every Child Matters Programme (Department of Children Schools and Families).*
- *Safeguarding Children and Safer Recruitment in Education 2010 (DCSF)*
- *No Secrets – Guidance DOH 2000*
- *Safeguarding Vulnerable Groups Act 2006*
- *Safer practice, safer learning: A whole-organisation approach to safeguarding vulnerable adults for the learning and skills sector. NIACE for the Department for Education and Skills 2007*

- The Multi Agency Adult Safeguarding Policy, Practice and Procedures. (*Luton, Bedford Borough and Central Bedfordshire*)
- *Handling Cases of Forced Marriage: Multi-agency practice guidelines. HM Government 2009.*

1. Duty of Care: Responsibility & Accountability

All Skills4Stem staff, associates and volunteers have a duty of care to ensure that any students who may be experiencing abuse or harm in education and training, at work, at home or in relationships has been referred to a member of staff with designated safeguarding responsibilities.

Skills4Stem's Senior Leadership Team, ensures that Skills4Stem fulfills its duties in relation to Safeguarding; however, the key designated safeguarding staff included the following:

The Senior Nominated Person must be a senior member of Skills4Stem's Leadership Team who can ensure that measures are put in place where necessary.

Senior Nominated Person responsibilities are:

- To ensure that Skills4Stem carries out its duties in relation to Safeguarding Children, Young People and Adults in the company.
- To act as the Designated Safeguarding Lead (DSL)
- To report to the Senior Leadership Team as required.
- To convene the Safeguarding Group quarterly.
- Undertake and deliver training in relation to Safeguarding.
- Provide an annual report to the Senior Leadership Team setting out how the company has discharged its duties.
- To ensure that Skills4Stem liaises with Bedford Borough Council Safeguarding team other external agencies as appropriate and necessary.
- To ensure that all staff and volunteers receive awareness training in safeguarding issues and are aware of Skills4Stem procedures.
- To appropriately refer children who may be at risk of significant harm to Children's Initial Contact Point in the Children's Social Care section of Bedford Council's Children and Young Person's Services Department. Where the home address for a student is in another local authority area the referral will need to be made to the local Children's Social Care or (Social Care) in the area where the student lives.
- To refer concerns that a Vulnerable Adult is or may be suffering serious harm to the Bedford Borough Council Adult Protection team where this fits with the multi-agency Adult Protection Procedures.
- To consult Bedford Borough Council Safeguarding team regarding complex cases and to check if Early Help Assessment has been undertaken.

- To be available to provide advice and support to staff on issues relating to Child, Young Person and Vulnerable Adult Protection.
- To support the student, ensuring they are central to the process and kept informed throughout.
- To respond to individual cases, including attending multi-disciplinary conferences as appropriate.
- To maintain proper records of referrals, complaint or concern (even where that concern does not lead to a referral)
- To ensure that the recording is securely stored and archived.
- To give feedback to the member of staff who made the referral where appropriate, taking information sharing and confidentiality issues into account.
- Where there are concerns about a student but not sufficient to make a referral a recommendation may be made that the student be offered an EHA (Early Help Assessment Framework). The Senior Nominated Person for Safeguarding will act as the lead professional in Skills4Stem.
- To monitor and assess students wishing to enroll who declare a criminal conviction.

Designated Safeguarding and Wellbeing Coordinators

Skills4Stem has one named Safeguarding and Wellbeing Coordinator, who is line - managed by the DSL and advise the staff, as appropriate.

Their Responsibilities are:

- To report to the named Designated Safeguarding Lead (DSL).
- To appropriately refer children who may be at risk of significant harm to Children's Initial Contact Point in the Children's Social Care section of Bedford Council's Children and Young Person's Services Department. Where the home address for a student is in another local authority area the referral will need to be made to the local Children's Social Care or (Social Care) in the area where the student lives.
- To refer concerns that a Vulnerable Adult is or may be suffering serious harm to the Bedford Borough Council Adult Protection team where this fits with the multi-agency Adult Protection Procedures.
- To consult Bedford Borough Council Safeguarding team regarding complex cases and to check if Early Help Assessment has been undertaken.
- To be available to provide advice and support to staff on issues relating to Child, Young Person and Vulnerable Adult Protection.
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- To ensure that the recording is securely stored and archived.
- To give feedback to the member of staff who made the referral where appropriate, taking information sharing and confidentiality issues into account

2. CRISIS/ EMERGENCY SAFEGUARDING SITUATIONS

(Between 8.30am – 5pm)

Life threatening situation or emergency referrals which require an immediate response due to an individual suffering or at risk of suffering significant harm:

- Ring for an ambulance and/or contact the police on 999
- Contact the Senior Designated Person /Designated Safeguarding Lead
- Head of Quality & Compliance or Designated Safeguarding Co-Ordinator
- Senior Leadership Team (SLT)

Designated Safeguarding Lead	Tracy Butler tracy@skills4stem.co.uk	Head Office	0333 939 8445 or 01234 969309
Designated Safeguarding Co-ordinator	Ruth Exelby ruth@skills4stem.co.uk	Head Office	0333 939 8445 or 01234 969309

- 24hr 7 days a week designated safeguarding number 01234 969309

Non-life threatening but serious incidents

Contact Tracy Butler on 0333 939 8445 or tracy@skills4stem.co.uk or Ruth Exelby on 0333 939 8445 or ruth@skills4stem.co.uk

In the unlikely event of not being able to contact any of the above ring one of the following, contact appropriate external below or our 24hr 7 days a week designated safeguarding number **01234 969309**

3. OUT OF HOURS EMERGENCY SAFEGUARDING SITUATIONS

24hr 7 days a week designated safeguarding number 01234 969309

Life threatening situation:

- Ring for an ambulance and/or contact the police on 999 or 101 non-emergencies

- If you think a child, young person or vulnerable adult is being abused or mistreated or you have concerns about a child young person or vulnerable adult's well-being you should call and speak to someone at one of the following numbers:

Out of hours emergency number for all councils	Children & Adults	0300 300 8123
NSPCC Helpline	Children Under 19	0808 800 5000

Emergency services use postcodes to find the exact location for any call outs that they receive.

Calls direct to the emergency services 999

4. NON-EMERGENCY SAFEGUARDING SITUATIONS

Situations that do not require an immediate or urgent response but where advice is required:

Contact Tracy Butler on 0333 939 8445 or tracy@skills4stem.co.uk or Ruth Exelby on 0333 939 8445 or ruth@skills4stem.co.uk

You can also email: safeguarding@skills4stem.co.uk

All staff involved in non-emergency safeguarding referrals should ensure that any further information, suggesting a threat or risk to life or significant harm, should refer to the emergency guidance immediately

5. SPECIFIC STUDENT COHORTS

The following student groups can be particularly vulnerable in terms of safeguarding and will need appropriate support.

LOOKED AFTER CHILDREN (LAC) AND CARE LEAVERS

Students who are in care of are leaving care are a particularly vulnerable cohort and need to be identified, monitored and supported throughout their time in Skills4Stem.

Sometimes specific contracts will be required to ensure appropriate adjustments are made in curriculum and support services to allow a student more flexibility if necessary.

The Quality Manager must be informed immediately if a student is found to be in care of leaving care and has not yet been identified as such.

Any safeguarding concerns can be referred through Skills4Stem's process set out in this document and / or referred directly to the Quality Manager.

The Quality Manager must be informed of any concerns regarding any student in or leaving care.

YOUNG CARERS / YOUNG PARENTS

Skills4Stem acknowledges that young carers (YC) and young parents (YP) may need extra support to ensure they have equal access to education and training.

The Quality Manager will take responsibility for collating information about the YC / YP cohort and will liaise with curriculum regarding the supporting and monitoring of these students.

The Quality Manager must be contacted if a student is found to be a carer or young parent who has not yet been identified as such.

Any safeguarding concerns regarding young carers or young parents should be referred to a Quality Manager immediately following the Skills4Stem referral process set out in this guidance.

6. CATEGORIES OF SAFEGUARDING

a) Physical Abuse

This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

b) Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children.

c) Psychological abuse

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

d) Sexual Abuse

Sexual abuse, including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressurised into consenting.

This involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities whether or not the person is aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts e.g. rape or molestation. It may also include involving the looking at, or being involved in the production of, pornographic material or watching sexual activities, or encouraging the person to behave in sexually inappropriate ways.

e) Non-contact abuse

Abusive acts which do not involve actual physical contact; pornographic or violent films, sexual acts performed in front of the victim, violent acts with the abused present.

f) Neglect

Neglect is the persistent failure to meet a child, young person or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to, basic emotional needs.

Neglect includes acts of omission, ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

g) Discriminatory abuse

Includes racism or sexism, abuse based on a person's disability, and other forms of harassment, slurs or similar treatment.

h) Institutional abuse

Occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care and poor practice which affects the whole setting and denies, restricts or curtails the dignity, privacy, choice, independence or fulfilment of persons at risk. Institutional abuse can occur in any setting providing health and social care.

i) Risk to self and/or others

This may include but is not exclusive to severe self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and/or stress.

Self-harm is a term that covers a range of behaviours used as a coping mechanism where an individual harms themselves by inflicting psychically pain or excess to deal with emotional pain

- Common methods of deliberate self-harm include:
- Cutting

- Over eating or under eating
- Burning your skin
- Inserting objects into your body
- Hitting yourself or walls
- Taking an overdose
- Swallowing hazardous substances
- Exercising excessively
- Scratching and hair pulling

The majority of the people who self-harm are using this method as an attempt to cope with difficulties and problems they have experienced or continued to be experiencing. Often the purpose is to feel alive, and NOT to end their life. Favazza (1998) states quite definitely that self-harm is distinct from suicide. A basic understanding is that a person who attempts suicide is seeking to end their life and the end of feelings whereas a person who self-harms seeks to feel better. However, there is a possibility that those who self-injure may commit suicide either accidentally or deliberately as the result of their actions, therefore serious self-harm falls within safeguarding.

j) Financial or Material Abuse

Financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

7. MAKING A REFERRAL

All staff and volunteers at Skills4Stem are expected to be aware of and respond to any concerns regarding students who are known or suspected to be experiencing abuse and harm and to pass these concerns on, following the Skills4Stem safeguarding procedures.

A child is defined as anyone under the age of 18 and an adult at risk is defined as anyone who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Where the student is not a Child or Vulnerable Adult the student will need to agree to information being shared. The only exception to this is where the member of staff considers the student to be at risk of serious harm.

What to do if a student discloses abuse or a member of staff has safeguarding concerns regarding a student

Please note that these guidelines are designed to protect staff as well as students.

Transgressing professional boundaries can result in disciplinary action, please always adhere to these guidelines.

- Acknowledge it and take it seriously.
 - Stay calm.
 - Believe the person.
 - Listen patiently; try not to ask any questions.
 - Let them take their time. Reassure them that they are doing the right thing in telling you
 - Write down the details, using their own words as far as possible. If appropriate ask the student to write it down. Log all information in Confidential Comments section of Infusionsoft.
 - Explain to the student that you have a legal obligation to pass this information on, to protect both them and possibly other members of the family and the public.
 - Refer the issue/incident to a designated Safeguarding member of staff i.e. Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator.
 - Members of the Safeguarding team can make referrals to external social care teams.
 - Ensure that the student is safe and try to ascertain how safe they will be if they leave the learning environment, work or return home.
-
- Respect confidentiality and do not discuss the disclosure with anyone other than the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator.
 - The information must be treated with the strictest confidence – the ‘need to know’ principle must be employed. The safeguarding team has the responsibility to decide what further action should be taken
 - Where a student has made a disclosure of abuse or a staff member has concerns about abuse no contact should be made with the student’s parents or carers without consultation with the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator.
 - You may have concerns that a student is experiencing abuse because of their behaviour or changes in their presentation or that they are missing from education, training or work. Signs and symptoms which may indicate abuse or harm are described in the online training. There are also some useful flowcharts at the end of this document. If you are still concerned contact the

Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator to discuss your concerns.

- A student may disclose information that leads to concerns that another child or young person or Vulnerable Adult is experiencing abuse. You need to inform the student that you will need to tell the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator.
- You may be contacted by the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator to request information from you about a student. This is because Skills4Stem may be asked to contribute information to Children's Social Care for an Assessment or Child Protection investigation. The Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will ensure that they are adhering to the government Information Sharing Guidance and will discuss with you what to inform the student. Where possible we will be as open as possible with the student.
- If you continue to be concerned about a student after you have informed the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator contact them again to let them know.

Staff should not:

- Make promises you cannot keep.
- Promise confidentiality.
- Appear shocked, horrified, disgusted or angry.
- Make comments or judgements, other than to show sympathy and concern.
- Ask leading questions.
- Give sweeping reassurances.
- Take the matter further yourself.
- Contact any other agencies other than those stated in the process flow charts.
- Give students money (refer to the CEO).
- Give your mobile number to students.
- Give lifts to students. There may be the rare occasion where, due to an emergency or exceptional circumstance, a student needs to be transported in a staff vehicle but please note that a risk assessment will be required with authorisation from your line manager, a relevant member of the safeguarding or a member of SLT.
- In an emergency, where a student needs to be transported to a place of safety, the police or a taxi must be used.

On the rare occasion that a Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator is unavailable, write down notes of what the learner has told you, or ask them to write it down themselves if you think this is appropriate for them. This is because they may not want to tell anyone again what they have shared with you.

Take down times, locations and any other relevant facts. Do not include your own opinions or views about the disclosure although you can describe the manner or state of the learner when they present themselves to you.

It is rare but there is a possibility you may be asked to attend a multi-disciplinary meeting outside Skills4Stem and/or give evidence in court proceedings in relation to this disclosure. Sign and date each page of the notes.

8. GUIDANCE ON SPECIFIC SAFEGUARDING CONCERNS:

a) Prevent: Radicalisation and Extremism

If there are concerns that a student is becoming radicalised or attempting to radicalise others this needs to be reported to the DSL immediately.

Skills4Stem's Specific Point of Contact for Prevent referrals is the Head of Quality & Compliance.

The Prevent Duty is part of the Counter Terrorism and Security Act 2015. Section 26 of the Act places a duty on educational institutions to have 'due regard to the need to prevent people from being drawn into terrorism'.

Prevent is one strand of the Government's counter terrorism Strategy, CONTEST. Its main aim is to prevent people from becoming terrorists or supporting terrorism. More information available here: [Protecting the UK against terrorism policy](#)

There are three main objectives:

1. Terrorist ideas should be identified and challenged.
2. Vulnerable people should be supported and protected from becoming terrorists or supporting terrorism.
3. Communities, institutions and the Government should all work together to tackle the problem of extremism.

Radicalisation is the process of causing someone to become a supporter of terrorism, or forms of extremism that lead to terrorism.

Any evidence of any aspect of extremism must be reported immediately. Please be vigilant for comments made on social media which may indicate vulnerability to radicalisation.

What causes radicalisation?

As yet, there has been no clear link or exact cause identified for someone becoming radicalised. This creates the sense that 'it could happen to anyone' which, in turn, increases the fear of radicalisation. The lack of an exact cause doesn't mean we know nothing and it's important to focus on what we do know and staying informed of current guidance. Radicalisation is constantly shifting and changing.

What we know as of now is that the main risk factor identified in victims is vulnerability.

Those who are most vulnerable are (but not limited to):

- Younger people from age 13 upwards;
- Those experiencing an identity or personal crisis;
- Individuals with feelings of un-met aspirations or a sense of injustice;
- People with a need for adventure or excitement;
- Pre-existing conviction that their religion or culture is under threat;
- Individuals [who feel socially isolated, and possibly, suffering from depression;](#)
- Those who have a history of criminal behaviour.

Some potential indicators:

- Change in appearance
- Search for answers - identity, faith and belonging
- Desire for adventure/excitement
- Desire to enhance self esteem
- Sense of grievance triggered by personal experience of racism/discrimination/aspects of government policy, etc
- Isolated from peers, associates with only 1 group of people
- Withdrawal from family members
- Additional vulnerability risk factors: Special Educational Needs, Mental Health Issues, Alcohol and Drug abuse

Some potential warning signs:

- Graffiti, symbols or artwork promoting extremist messages
- Accessing extremist material online
- Changes in behaviour, friendship and actions
- Young people voicing opinions drawn from extremist ideologies or narratives
- Use of extremist or hate terms to exclude others or incite violence

People who are at risk of being drawn into terrorist activity can be supported through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

Skills4Stem regulations regarding use of IT are included in the IT policy. Internet usage in Skills4Stem is monitored and any concerns raised through safeguarding.

All Skills4Stem staff have a duty to report any concerns about extremist behaviour or potential radicalisation.

Students taking time off during agreed from agreed delivery time

It is a Skills4Stem requirement to report any student asking for authorised absence during term time of 5 days or more. Such students must be referred to the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator.

Relevant checks will be carried out in line with safeguarding policy. Leave during term time for holiday purposes should not be authorised.

In the event of a student taking unauthorised leave during term time of 5 days or more, the curriculum staff should alert the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator if they do not return when expected.

b) Forced Marriage

A Forced Marriage is a relationship conducted without the valid consent of both parties, where duress is a factor.

Forced Marriage is different from, and should not be confused with, arranged marriage. A student who feels they are likely to be forced to marry someone they do not wish to marry is invariably experiencing some form of abuse such as physical, psychological, financial, sexual and emotional pressure.

If there are concerns that a student is in danger of a forced marriage the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will follow government guidelines and contact will be made with the Government Forced Marriage Unit. (fmu@fco.gov.uk Telephone: 020 7008 015)

Forced marriage is illegal in the UK.

Confidentiality is extremely important in these circumstances. Try to ascertain how immediate the risk may be. If the student is under 18 years or vulnerable, staff must consult with a Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator immediately. If the student is not under 18 or vulnerable, staff may wish to consult with the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator for support and advice.

If the student is going overseas imminently it is important to contact the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator immediately and to gather as much information as possible from the student.

The student's family should not under any circumstances be contacted without consultation with the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator and student. Confidentiality within Skills4Stem is also essential.

c) Child Sexual Exploitation

Child sexual exploitation is illegal activity by people who have power over children and young people and use it to sexually abuse them. This can involve a broad range of exploitative activity, from seemingly 'consensual' relationships and informal exchanges of sex for attention, accommodation, gifts or cigarettes, through to very serious organised crime. Children and young people at risk of sexual exploitation are some of the most vulnerable in our society. Many have experienced abandonment or have suffered from physical and mental abuse previously. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted

pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited may not exhibit any external signs of this abuse. If you become aware of or suspect that a student is being sexually exploited this needs to be reported to the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator using the safeguarding procedures outlined.

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

UK National Working Group for Sexually Exploited Children and Young People

d) Female Genital Mutilation (FGM)

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK and staff working within education or health have a duty to report any evidence of FGM. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. The procedure is traditionally carried out by a woman with no medical training. Anesthetics and antiseptic treatments are not generally used, and the practice is usually carried out using knives, scissors, and scalpels, pieces of glass or razor blades

FGM is illegal in the UK. It is also illegal to arrange for a child to be taken abroad for FGM. If caught, offenders face a large fine and a prison sentence of up to 14 years.

All professionals have a duty to act to safeguard girls at risk of FGM with four key issues to consider:

1. An illegal act being performed on a female, regardless of age
2. The need to safeguard girls and young women at risk of FGM
3. The risk to girls and young women where a relative has undergone FGM
4. Situations where a girl may be removed from the country to undergo FGM.

There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a significant risk. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216669/dh_124588.pdf

e) Bullying: Person to person

Bullying is one of the most common forms of abuse. For some young persons/vulnerable adults, bullying can be taken to the extreme and can make their lives intolerable. Bullying is something that needs to be taken very seriously. There is sufficient evidence to show that the consequences of bullying can be devastating both to the victim and their family.

There are three main types of bullying:

- Physical, eg hitting, kicking or theft
- Verbal, eg racist or homophobic remarks
- Emotional, eg persistent negative feedback

All these will include:

- Deliberate hostility and aggression towards the victim
- A victim who is weaker and less powerful than the bully or bullies
- An outcome which is always painful and distressing for the victims

Bullying behaviour may include:

- Other forms of violence
- Sarcasm, spreading rumours, persistent teasing
- Torment, ridicule, humiliation
- Racial taunts, graffiti, gestures
- Unwanted physical contact or abusive, offensive comments of a sexual nature

f) Cyber Bullying

Mobile phone/computer bullying involves several behaviours including:

- Sending anonymous texts, making threats of violence
- Communicating through e mails/ chat rooms/messaging services
- Giving out personal information that young people feel embarrassed about
- Sending frightening or obscene images with or without a threat

g) Honour Based Violence

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

The term 'honour based crime' covers any criminal offence that is driven by a mistaken desire to protect the cultural or traditional beliefs of a family or community. It may or may not involve violence. It can include:

- personal attacks of any kind, including physical and sexual violence
- forced marriage
- forced repatriation (sending someone back to a country from which they originate without their consent)
- written or verbal threats or insults
- threatening or abusive phone calls, emails and instant messages

The Police record and investigates all instances of honour based violence, even in cases where there is only a small amount of information or when a victim has not reported it themselves. They do this so that we can provide more protection that could prevent further abuse or violence or in some cases, forced marriage.

h) Domestic Violence

Domestic violence also known as domestic abuse is defined as: *"An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of a person's gender or sexuality"*.

Home Office: 24th March 2015-Domestic Violence.

Domestic violence can include, but is not limited to, the following types of abuse: psychological, emotional, physical, sexual and financial. It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage.

Domestic violence affects people of every class, gender, wealth, geography, age, race, disability and sexuality. The violence can begin at any stage of the relationship and may continue after the relationship has ended. Domestic violence is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship.

If a student discloses, they are in an abusive relationship, we have a duty to offer them support, and /or find the relevant organisation that may be able to help them. If the student is a child, the information must be shared with the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator without delay. If the student is an adult it is important to establish if they have children under 18. If the victim does have young children a referral may need to be made to Children's Social Care, with consent from the parent.

i) Sexting

Sexting generally refers to the sending of sexually explicit images via text, email, MSN or through social networking sites. For example, this could be a picture of a boy or young man exposing himself or a young woman in a state of undress. 'Sexting' is more common than you may think and has been found to be commonplace amongst children and young people.

There was a 28% increase in calls to ChildLine in 2012/13 (compared to the previous year) that mentioned 'sexting' – nearly one every day.

Most young people do not see 'sexting' as a problem and are reluctant to talk to adults about it because they are afraid of being judged or having their phones taken away. It may be common, but 'sexting' is illegal. By sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission.

Young people (under 18) texting intimate pictures of themselves via social media are committing a criminal offence (distribution of child pornography) and can face police action, even if their actions are entirely voluntary.

j) On Line Safety

With the launch in 2005 of the Government's e-strategy, 'Harnessing technology: Transforming learning and children's services', the prospects for children and learners of all ages to embrace the new opportunities offered by ICT has grown.

What we must ensure, however, is that the e-safety aspects are not left to chance. Children and indeed learners of all ages need to develop digital literacy skills that help them to become safe and responsible users of new technologies and allow them to be discriminating users of both the content they discover and the contacts they make when online.

On line safety risks can be summarised under the following three headings.

Content

- Exposure to age-inappropriate material
- Exposure to inaccurate or misleading information
- Exposure to socially unacceptable material, such as that inciting violence, hate or Intolerance including extremism and radicalisation
- Exposure to illegal material, such as images of child abuse
- Illegal Downloading of copyrighted materials e.g. music and films

Contact

- Grooming using communication technologies, potentially leading to sexual assault and/or child prostitution

- Bullying via websites, mobile phones or other forms of communication device

Commerce

- Exposure of minors to inappropriate commercial advertising
- Exposure to online gambling services
- Commercial and financial scams

The creation, downloading, distribution and copying of pornographic images of children are child abuse and are criminal offences. They are classed as gross misconduct and will lead to instant dismissal for staff and Behaviour Support process with possible exclusion for students.

If you become aware of the creation, downloading, distribution or copying of pornographic images of children: contact the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator immediately. If they are not available contact a member of the Senior Leadership Team immediately.

k) Students who may present a risk to other students, including sex offenders and violent offenders.

If any member of staff becomes aware or is concerned that a student who is enrolling or already attending Skills4stem may have been involved in sexual or violent offences this information needs passing immediately to the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator who will contact outside agencies to obtain any risk information on a 'need to know' basis. Skills4stem does have a role in rehabilitation of offenders but will assess the risks to other students.

l) Allegations of a student abusing another student

If a student has reported being abused by another student, the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator should be contacted immediately. The student who it is alleged has been abused will be advised regarding reporting to the police. In some circumstances the Designated Safeguarding Lead will contact the Police especially if the alleged victim is vulnerable. If the students are under 18 years their parents may be contacted (students wishes will be taken into account when deciding this). Serious consideration of immediate suspension of the student who is alleged to have abused the other student will be given whilst an investigation is undertaken. If the decision is taken not to suspend the student a risk assessment will be undertaken, and a risk management plan put in place (coordinated by the Designated Safeguarding Lead). If the police or Children's Services or the Adult Protection Unit are undertaking an investigation it is likely that Skills4stem will need to wait for the outcome of this to undertake its own investigation (in some cases this takes several months). The safety of other students must be considered in any disciplinary process. Support needs to be offered to the student alleging abuse and where appropriate the alleged abuser.

m) Removing a student to a place of safety

If a student discloses domestic violence / abuse, or threat of forced marriage, or 'lock down' (not permitted to leave home or movements severely restricted, not permitted to use internet / mobile, passport and other ID confiscated at home) and declares that they would like to be taken to a place of safety you need to:

Report immediately to the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator

They will will contact the appropriate external agencies.

Arrangements will be made to remove the student to a safe place (this might be local or out of area depending on the wishes of the student and availability of rooms)

The police or a taxi service should be used to transport a student in this situation.

Under no circumstances should staff put themselves at risk of harm by using their own vehicles to transport a student to a place of safety, without consultation with the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator.

The student may be removed on the same day or within a very short period of time after disclosure depending on the urgency of the case.

The student should not return to the domestic residence to collect belongings in cases of high risk. This can be done at a later time under police escort.

Under no circumstances should the student's family/carers be contacted.

The Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will inform the police of the situation.

If a child is involved, the the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will contact the relevant team to discuss arrangements. If an allegation of abuse is made against a child, then the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will contact the local Children's Safeguarding Team.

The police will then respond accordingly to any reports of the student as a missing person.

If the family members / carers contact Skills4stem they should be referred to the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator.

No information should be shared with the caller about whether the student is or is not attending a Skills4stem programme.

In some cases, the student will be withdrawn from a Skills4stem programme. In some cases, the student will remain on course. In these situations, the the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will ensure appropriate measures are in place to maximise the safety of the student entering and leaving a Skills4Stem programme.

Financial support should be sought for students remaining on course having been removed to a place of safety.

n) Allegations against staff

The statutory guidance in Keeping Children Safe in Education 2015 will be followed in relation to allegations against staff.

If allegations are made against a member of staff, which involve a student on a Skills4Stem programme the same procedures as outlined above must be followed. The Designated Safeguarding Lead will inform the Chief Executive Officer (CEO). The matter will be investigated in accordance with the Staff Disciplinary procedure and depending on the severity of the allegations, outside agencies may be informed. Following the investigation, the formal disciplinary procedure may be invoked. The member of staff may be suspended pending a full investigation.

If allegations are made which do not involve a student at Skills4Stem, the staff member must inform the Designated Safeguarding Lead, who will collate information to report to the CEO. The matter will be investigated in accordance with the Staff Disciplinary procedure and depending on the severity of the allegations, outside agencies may be informed. Following the investigation, the formal disciplinary procedure may be invoked. The member of staff may be suspended pending a full investigation.

The following definitions will be used following any investigation:

- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation, the term, therefore, does not imply guilt or innocence.

Depending on the outcome of an investigation and any appropriate disciplinary action, an appropriate referral to the Disclosure and Barring Service will be made. Referrals to the Disclosure and Barring Service will also be made should a resignation take place during the investigatory phase or prior to a formal disciplinary hearing. 'Settle Agreements' will not be appropriate in these circumstances.

Members of staff involved in allegations will have a designated contact at Skills4Stem who either will be a senior manager or a member of the HR team. If the employee has a grievance this should be pursued in accordance with the Skills4Stem Grievance Procedure.

9. CURRICULUM STAFF ATTENDANCE AT EXTERNAL MEETINGS

- Sometimes curriculum staff are contacted by external agencies with requests for attendance at external meetings e.g. case reviews, LAC reviews, Child in Need review.
- Curriculum staff should refer to the the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator

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- Arrangements should be made for the attendance at external meetings by the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator where possible.
- If it is appropriate for curriculum staff to attend, e.g. *the meeting is not in teaching time*, and then permission from the relevant line manager should be sought.

10. RECORDING INFORMATION

Information that is passed on to the Social Services must be as helpful as possible. There is a necessity for making as detailed and accurate record as possible. This should contain:

- The nature of the incident;
- A description of any visible injuries;
- The young person's account;
- Times, dates or other relevant information, e.g. in the case of sexual abuse of young persons, supply details of younger siblings (if known);
- A clear distinction between fact, hearsay and opinion.

What You Should Do Next

Concerns and allegations about abuse require very careful handling and should be treated with the strictest confidence. Any form of abuse can ultimately result in a criminal conviction. It is important to keep an open mind and that all allegations are kept in the strictest practical confidence. It is important you act on your concerns.

Once a referral is made the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will undertake the following:

- Ensure that the young person is not in any immediate danger. Seek medical attention if they are suffering from a serious injury.
- The student will be asked to repeat the disclosure they have made. Every effort will be made to communicate with the student in a way that is appropriate to their age, understanding and preference. The student will be asked if there are younger children or vulnerable adults who might also be at risk. The safeguarding officer will avoid asking leading questions and will not attempt to investigate the allegations. A written account will be made of the disclosure and the student will be asked to sign it.
- If the student wishes to take the allegation forward, they will be supported in contacting Social Services, the police and/or counselling support.
- When a student is not sure about taking the allegation forward, the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator may discuss their concerns with the Social Services and/or the police so that an informed decision can be taken. In this instance the student will not be identified.

- Where practicable, concerns will also be discussed with a parent or guardian unless this may place the student at risk of harm. The student's views will also be taken into account.
- In the event of a decision to report, the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator will inform the student of the proposed action and the reasons for the decision.
- All concerns, discussions, decisions made and reasons for those decisions will be recorded, in Infusionsoft where unauthorised persons cannot access them.
- There may be instances where more than one safeguarding member of staff will be involved in a particular case and will work collaboratively.
- Individual staff should never deal with abuse disclosures in isolation and should always refer to the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator. These are the only people who should make the decision whether to report suspected abuse to Social Services and/or the Police

11. STAFF TRAINING

Duty of Care

ALL STAFF HAVE A DUTY TO READ

Keeping Children Safe 2015: See appendix 1 Skills4Stem employees and Associates are accountable for the way in which they exercise authority, manage risk, use resources, and actively protect children and young people from discrimination and avoidable harm.

Prevent Duty training is mandatory for all staff and associated. The training consists of completing on-line elearning modules and a presentation on the legal duty and Ofsted expectations. This training is embedded in induction for all new staff and is recorded through HR staff development.

Staff should develop respectful, caring and professional relationships between themselves and young people. Staff behaviour should demonstrate integrity, maturity and good judgement. E.g. management of risk when teaching and assessing off site.

(See: Appendix 11 Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings March 2009)

The Children's Act 2004 makes it a duty for Skills4Stem to have a rolling programme of awareness training for all staff.

Training including on line, will be offered to all members of staff on a two-year rolling programme to make sure that they are aware of the procedures to be followed should they suspect a case of abuse. Specialist training will be provided for the

designated members of staff and the designated governor with child and adult protection responsibilities.

All staff will be informed about the particular safeguarding risks for Looked after Children.

All new staff (including temporary and volunteers) will receive an induction to include safeguarding children, young people and vulnerable adult's policies and procedures and a written code of conduct.

Learners will be given opportunities to learn about safeguarding e.g. awareness weeks, enrichment events, external links, tutorials and induction.

Information on Skills4Stem's procedure for safeguarding will be communicated to parents/carers and is available for the wider community.

12. SUPPORTING STAFF

We recognise that staff working in Skills4Stem who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL, HR Manager and/or their immediate line manager, and to seek further support as appropriate.

WHISTLE BLOWING

We recognise that young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff and students should be aware of their duty to raise concerns, where they exist, about the management of child protection and the protection of vulnerable adults, which may *include the attitude or actions of colleagues, and are encouraged to do so.*

See Whistle Blowing Policy

Appendix 1:

Keeping Children Safe March 2015 Section 1

What Skills4Stem staff should know and do:

1. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
2. Children includes everyone under the age of 18.
3. Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

The role of the training provider

4. Everyone who comes into contact with children and their families has a role to play in safeguarding children. Skills4Stem staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Skills4Stem staff form part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children 2015. Training providers should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.
5. Each training provider should have a designated safeguarding lead who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

The role of Skills4Stem staff:

6. The Teachers' Standards 2012 state that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. Such action might be taken under section 47 and section 44 of the Children Act 1989. Such action might be taken under section 17 of the Children Act 1989. 4 The Teachers' Standards apply to:

trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]).

8. All staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

9. In addition to working with the designated safeguarding lead staff members should be aware that they may be asked to support social workers to take decisions about individual children.

What Skills4Stem staff need to know?

10. All staff members should be aware of systems within their organisation which support safeguarding, and these should be explained to them as part of staff induction. This includes: the organisations child protection policy; the organisations staff behaviour policy (sometimes called a code of conduct); and the role of the designated safeguarding lead.

11. All staff members should also receive appropriate child protection training which is regularly updated.

What Skills4Stem staff should look out for:

12. All Skills4Stem staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

13. Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

14. There are various expert sources of advice on the signs of abuse and neglect. Each area's Local Safeguarding Children Board (LSCB) should be able to advise on useful material, including training options. One good source of advice is provided on the NSPCC website. Types of abuse and neglect, and examples of specific safeguarding issues, are described in paragraphs 24-29 of this guidance.

15. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure, they should always speak to the designated safeguarding lead. In exceptional circumstances, such as in emergency or a genuine concern that

appropriate action has not been taken, staff members can speak directly to children's social care. Department for Education training materials on neglect.

16. A child going missing from education is a potential indicator of abuse or neglect. Staff members should follow the organisations procedures for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. More information can be found in departmental advice about attendance and statutory guidance about children who run away or go missing from home or care.

What Skills4Stem staff should do if they have concerns about a child?

17. If staff members have concerns about a child they should raise these with the designated safeguarding lead. The safeguarding lead will usually decide whether to make a referral to children's social care, but it is important to note that any staff member can refer their concerns to children's social care directly. Where a child and family would benefit from coordinated support from more than one agency (for example education, health, housing, police) there should be an inter-agency assessment. These assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who could be a teacher, special educational needs coordinator, General Practitioner (GP), family support worker, and/or health visitor.

18. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

19. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice

includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

Appendix 2

INVESTIGATING ALLEGATIONS OF CHILD PORNOGRAPHY

A brief guide for staff who may be called upon to investigate allegations of child pornography on any computers within Skills4Stem.

Staff should be aware of the Legal guidelines that have been set out by The Crown Prosecution Service. This is to protect members of staff from any potential compromising situation, and to ensure that any subsequent Police investigation is not inadvertently jeopardised.

The Crown Prosecution Service have published an official document Memorandum of Understanding Between Crown Prosecution Service (CPS) and the Association of Chief Police Officers (ACPO) concerning Section 46 Sexual Offences Act 2003) which clarifies the position of professionals involved in such tasks. This document outlines how the activities of staff will be assessed to confirm that they are acting legitimately to combat the creation and distribution of images of child abuse, and not as cover for any other activities.

The taking or making of an indecent photograph of a child is a Criminal offence under The Protection of Children Act 1978. Section 1(1) and carries a maximum penalty of 10 years' imprisonment. 'Making' includes not only the process of downloading an image from the Internet, but also knowingly creating an electronic copy of this file. To be an offence such 'making' must be a deliberate and intentional act, with the knowledge that the image made was, or was likely to be, an indecent photograph or pseudo-photograph of a child.

The basic rule is to NEVER make a copy during the course of any investigation and only ever view such material as a very last resort. The CPS do however recognize that situations do arise where individuals (for example a person to whom the accidental find is reported) knowingly 'make' another copy of the photograph or pseudo-photograph in order that it will be reported to the correct authorities.

The CPS have stated that 'it is highly unlikely that it would be in the public interest to embark on a prosecution' providing that an individual can prove that a copy was made for the purposes of the prevention, detection or investigation of crime, or for the purposes of criminal proceedings.

In order to reassure staff that they will have protection from any subsequent criminal proceedings, which could lead from an internal investigation, the following has been created as a defence to the charge of making:

The Sexual Offences Act 2003 includes at section 46 an amendment to the 1978 Act created as a defence to the charge of “making”. A defence is available where a person ‘making’ such a photograph or pseudo-photograph can prove that it was necessary to do so for the purposes of the prevention, detection or investigation of crime or for the purposes of criminal proceedings

Basic Rules

1. Accidental discovery of what may be perceived as an indecent photograph of a child it is the police that should be investigating such material, and as soon as it seems likely that an indecent photograph of a child has been found the Designated Safeguarding Lead and the Chief Technical Officer should be contacted immediately. They will then contact the police. The Chief Technical Officer should then switch off the PC and remove it to a designated secure place pending investigation.

2. Allegations that an indecent photograph of a child exists on Skills4Stem IT equipment

The only situation involving child pornography that need not be reported immediately to the police is where there is an allegation that a member of Skills4Stem has been accessing such material.

Unfortunately, there have been cases where such allegations have been made falsely and maliciously. If there is doubt over such an allegation, then the designated staff will need to perform the minimum of investigations necessary to verify it.

12.1 Guidelines for Preliminary Investigation

If an allegation of child pornography is made contact the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator. They have the necessary authority to order an investigation.

Do not start an investigation and especially do not investigate an allegation on your own. An authorised team will investigate all allegations.

The following rules must be adhered to:

- All investigations should be recorded in writing, with every click and URL recorded.
- Two staff should be present during all such investigations: both should then sign and date every sheet of the record of the investigation. The result of the investigation should be reported to the senior member who authorised it.
- As soon as evidence of child pornography are found STOP. Report to the Police immediately.

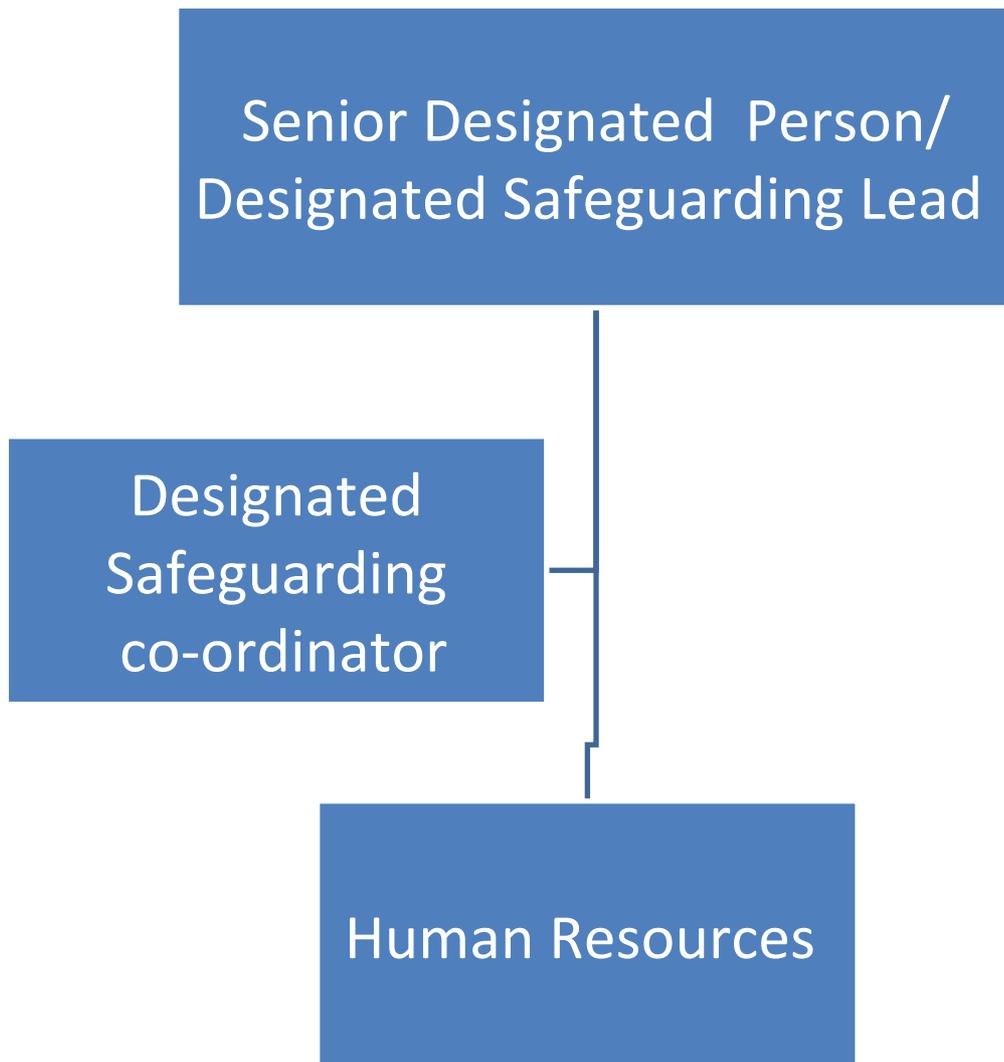
- Do not show the material to anybody other than to the investigation lead. It may compromise you and your colleagues and may jeopardise any subsequent police investigation.
- Do not take copies of the material. Taking a backup copy of an image file as evidence is likely to constitute 'making' and not just possession of child pornography and carries a maximum penalty of 10 years.

Often checking a list of URLs visited will be sufficient to confirm suspicions, so actually visiting sites should be regarded as an absolute last resort. If it is necessary to visit a suspect web site then they should be viewed with a text-only browser, or at least with all image downloads turned off. The text or filenames of a site will often indicate the nature of the content.

- Immediately remove the file
- Do not copy it
- Move the machine to a safe area
- Report the discovery to Designated Safeguarding Lead and the Chief Technical Officer
- Do not send copies to anyone, even HR
- Makes an audit trail, record times and actions

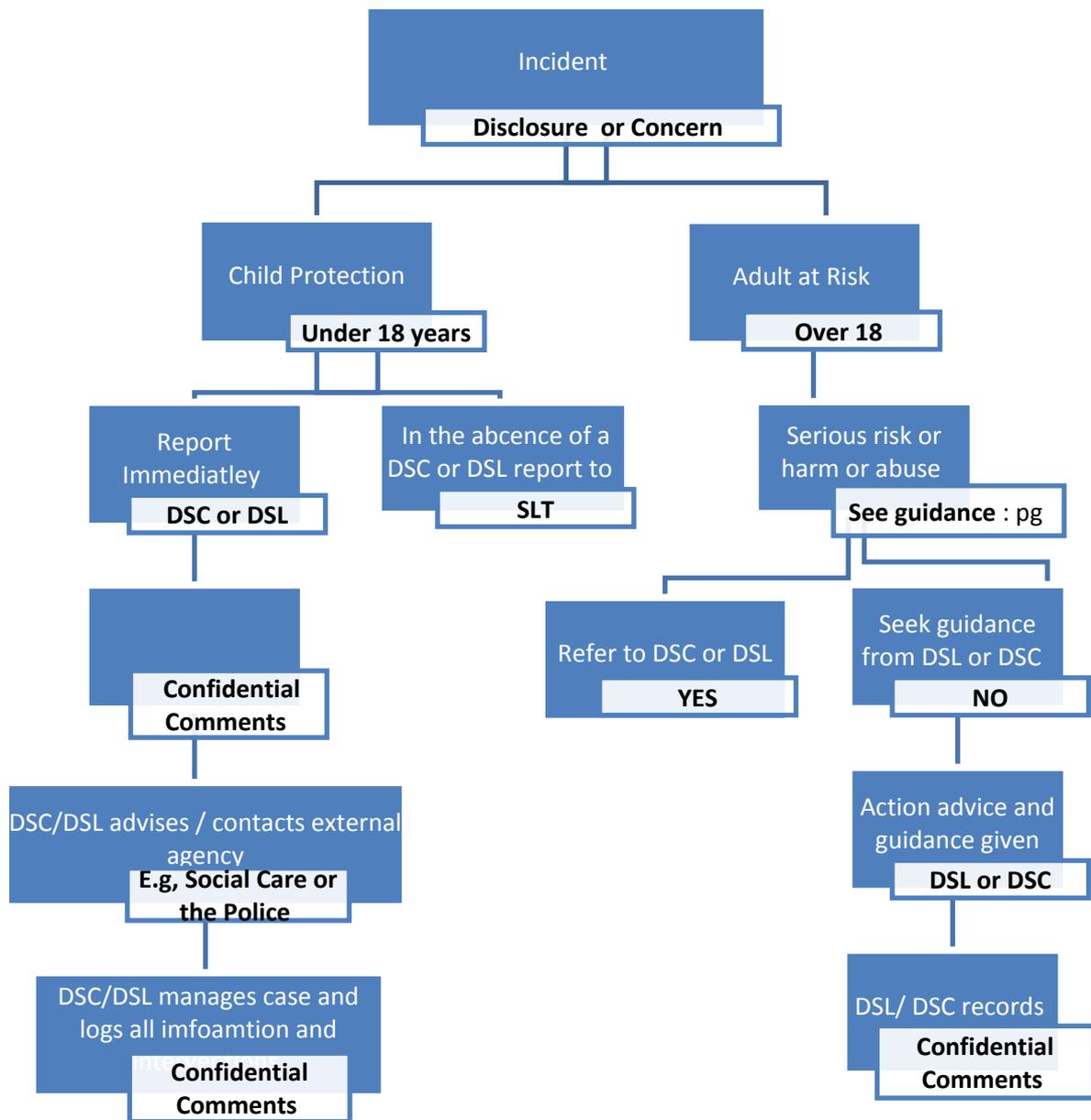
Appendix 3:

Safeguarding Team Structure



Appendix 4

Safeguarding Procedure Flow Chart



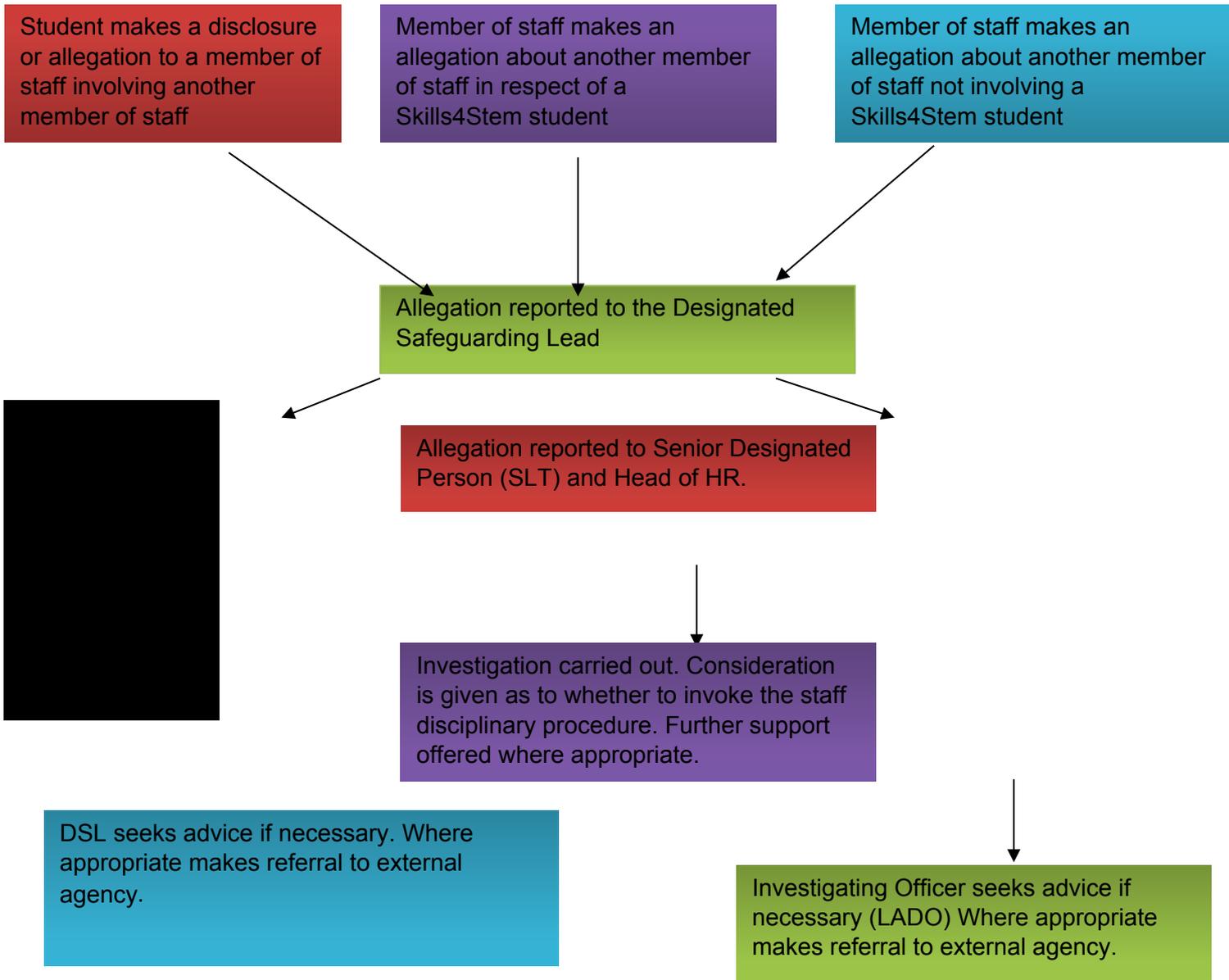
Appendix 5:

Responding to a Disclosure, Suspicion or Allegation



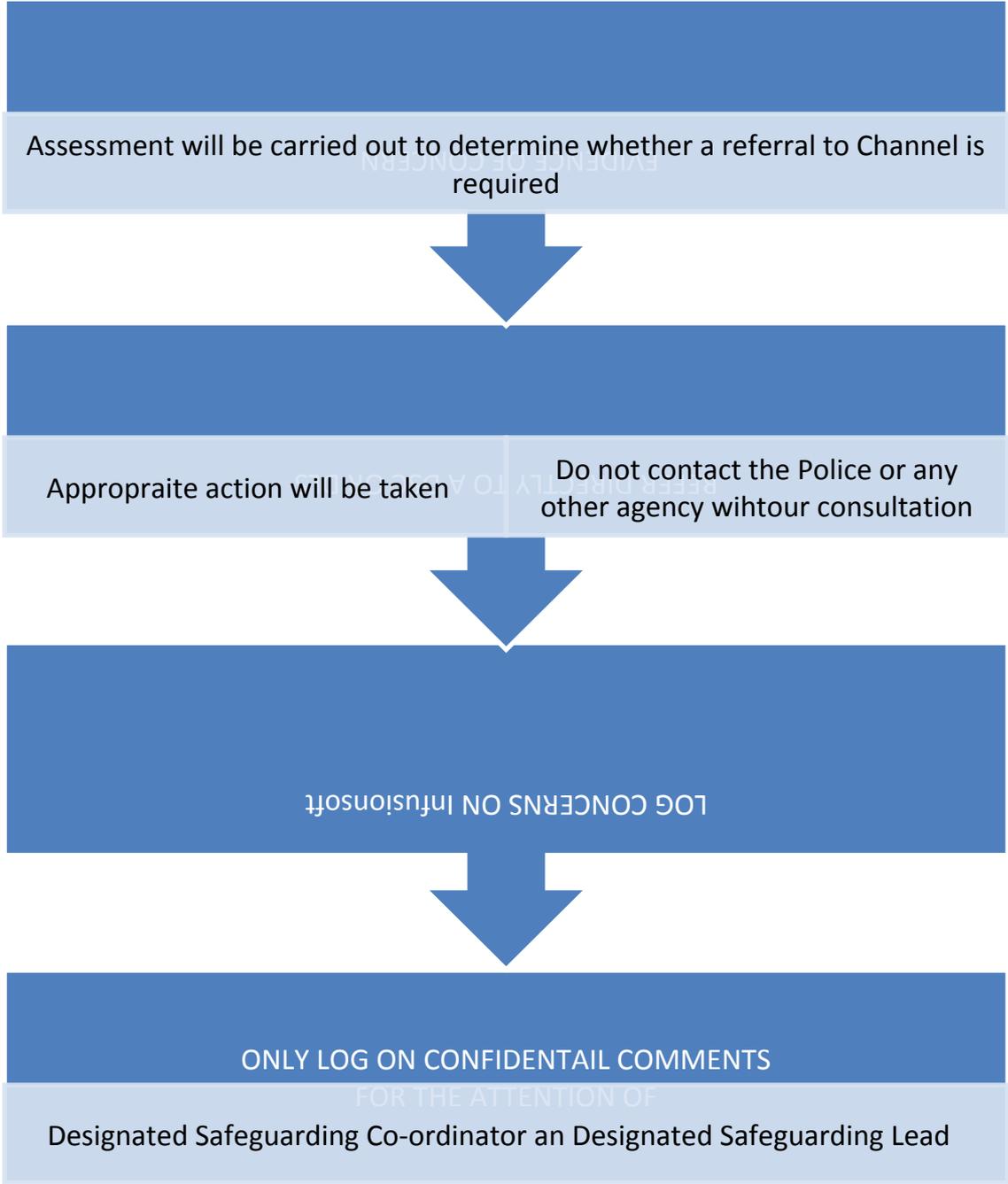
Appendix 6:

PROCEDURE FOR DEALING WITH ALLEGATIONS AGAINST STAFF



Appendix 7:

1. Prevent procedure flowchart



Appendix 8:

Forced Marriage: Specific warning signs

- Persistent absence
- Request for extended leave of absence and failure
- Surveillance by siblings or cousins
- Decline in
- Being withdrawn by those with parental
- Not allowed to attend extra-curricular activities

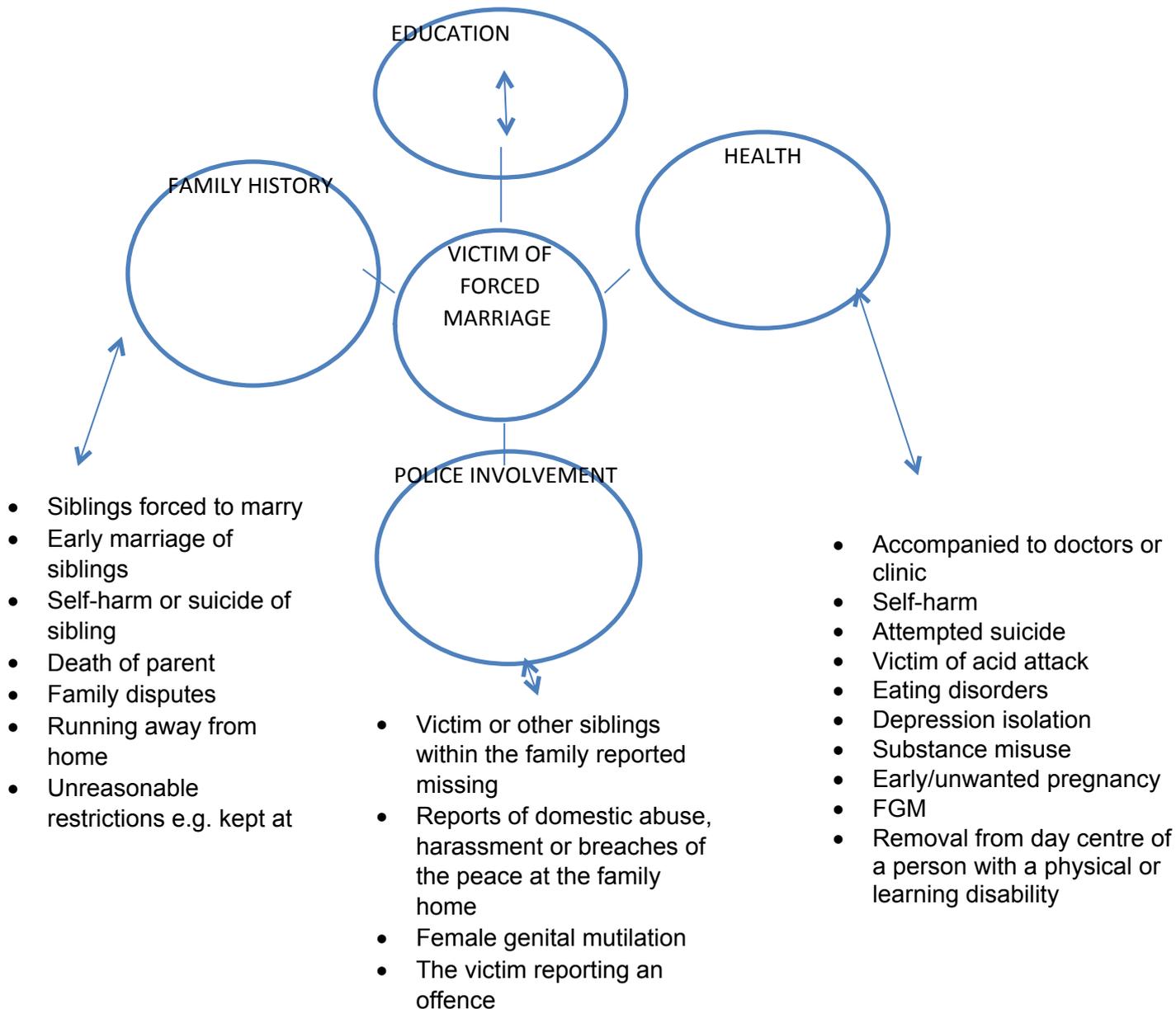
to return from visits to country of origin

behaviour, engagement, performance or punctuality

- Poor exam results

responsibility and being provided with suitable education at home

- Sudden announcement of engagement to a stranger
- Prevented for going on to further/higher education



Appendix 9:

Radicalisation warning signs

- Changes in appearance
- Openly questioning sense of self and identity, for example a new or all-consuming interest in faith and belonging;
- Desire for adventure/excitement;
- Desire to enhance self –esteem;
- An increased interest in current event, but simplistic reasoning skills;
- Sense of grievance triggered by personal experience or perceived experience of racism/discrimination/aspects of government policy etc;
- Isolated from peers;
- Withdrawal from family members;
- Graffiti, symbols or artwork promoting extremist messages;
- Accessing extremist material on line;
- Changes in behaviour or friendship groups;
- Young people voicing opinions drawn from extremist ideologies or narratives;
- Use of extremist or hate terms to exclude others or incite violence

Notes: Student with learning difficulties or Mental Health or Behavioural issues is particularly vulnerable to extremist propaganda and radicalisation.

Appendix 10:

Child Sexual Exploitation: Warning signs and vulnerabilities checklist

The following are typical vulnerabilities in children prior to abuse:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, and parental criminality).
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour' based violence, physical and emotional abuse, risk of forced marriage).
- Recent bereavement or loss.
- Gang association either through relatives, peers or intimate relationships (in cases of gang associated CSE only).
- Attending Skills4Stem with people who are sexually exploited.
- Learning disabilities.
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families.
- Friends with young people who are sexually exploited.
- Homeless
- Lacking friends from the same age group.
- Living in a gang neighbourhood.
- Living in residential care.
- Living in a hostel, bed and breakfast accommodation or foyer.
- Low self-esteem or self- confidence.
- Young carer.

The following signs and behaviours are generally seen in children who are already being sexually exploited:

- Missing from home or care.
- Physical injuries
- Drug or alcohol misuse
- Involvement in offending
- Repeat sexually-transmitted infections, pregnancy and terminations.
- Absent from training
- Change in physical appearance.
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites.
- Estranged from their family
- Receipt of gifts from unknown sources
- Recruiting others into exploitive situations
- Poor mental health
- Self-harm
- Suicidal ideation or attempts.

Appendix 11:

SAFEGUARDING ISSUES AND NON-SAFEGUARDING ISSUES

Safeguarding within the context of education is an umbrella term, which includes Health and Safety, Human Resources and Security; however, this guidance aims to clarify how to deal with concerns and disclosures specific to children and vulnerable adults at risk of serious harm, abuse or death.

So, what is a child and adult protection concerns and what are not?

Child or Adult Protection Concerns	Issues which are NOT safeguarding
Forced Marriage	Falling out with friends
Forced Genital Mutilation (FGM)	Falling down the stairs
Sexual activity under 16 yrs	Accidents or accidental injury
Rape inc historical rape	Emotional reactions to everyday occurrences
Assault- inc sexual assault	Illness
Violence and threats of violence	Taking medication (in line with medical advice)
Neglect -inc parental issues (drugs, alcohol, violence)	Forgotten lunch money
E safety / on line bullying/ Facebook / twitter threats	Losing money
Missing people	Needing support for non- threatening issues
Grooming	Not getting on with teachers
Extreme self-harm	Arguing with parents
Suicidal Ideation/Attempts	Managed self- harm outside the organisation
Drug / alcohol abuse	Breaking up with boyfriend / girlfriend
Trafficking	Unkind comments with no implied threat
Homelessness	Theft with no risk to students
Bullying	Having counselling / therapy
Hate crimes (gender, sexuality, race, faith, disability, background)	Depressed / feeling down
Psychological abuse	Hungry
Discovery or disclosure of involvement with the Police or YOT regarding a violent or sexual offence.	Involvement with the Youth Offending Team or the police for a non- violent, or non-sexual offence, or allegation.
Physical abuse	Tripping hazard
Emotional abuse	Lost bus pass
Sexting- under 18	
Forced prostitution	

- Ask yourself ... is the student at immediate risk of harm or abuse, If they answer is no it may not be a safeguarding concern, but talk it through with the DSC or DSL

Appendix 12:

Useful contact information CONTACT INFORMATION		
BEDFORD Multi-Agency Hub (MASH) Emergency Duty Team	BEDFORD BOROUGH	Office hours: 01234 718700 Out of office hours: 0300 300 8123
BEDFORD Safeguarding Children Board Chair	BEDFORD BOROUGH	Jenny Myers 01234 276512 or 01234 276346 Email: LSCB@bedford.gov.uk
Local authority Designated Officer (LADO) Officer	BEDFORD BOROUGH	TBC
Gateway to Care (Advice and Referrals)	BEDFORD BOROUGH	Care for Adults: 01234 792305 Care for Children: 0800 023 2057
NSPCC helpline	National	0808 800 5000 Email: help@nspcc.org.uk
BEDFORD District Safeguarding and Reviewing Unit (Police)		01234 846914 Crimestoppers 0800 555 111

Appendix 13:

Safer Working Practice

This guidance has been produced to help staff establish the safest possible learning and working environments for children; young people and vulnerable adults. The guidance also aims reduce the risk of adults working with students being falsely accused of improper or unprofessional conduct.

These simple steps will help ensure that professional boundaries and Skills4Stem policies are maintained.

All staff should be making sure they have read the Skills4Stem's Staff Code of Conduct, with particular reference to professional boundaries.

- Wherever possible avoid spending time unobserved with students unless it is in an agreed education setting.
- Where absolutely necessary invite the student to bring someone with them, move into the view of others or leave the door open.

- Where a private conversation is absolutely necessary inform another member of staff of your whereabouts and approximately how long you will be with the student.
- Workers and volunteers should watch out for each other. Are colleagues being drawn into situations, which could be misinterpreted? How colleagues view each other's practice will be how outsiders view it including parents or carers.
- Be aware of any physical contact with students. Where necessary, for example, when there has been an accident ensure that you are treating the person for the injury. Do not continue with any additional contact wherever it is unnecessary.
- Do not have or be perceived to have favorites.
- Do not offer lifts to students outside your normal working duties, unless this has been brought to the attention of your line manager or the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator and has been agreed with the parents/carers where appropriate.
- In an emergency, where a student needs to be transported to a place of safety, the police or a taxi must be used.
- Where it has been authorised that you may transport a student/s in your car then ensure that your manager knows how long you will be and ensure that you take a mobile telephone with you in case of unexpected delay. Ask the student/s to sit in the back. It is strongly advised that two members of staff are present.
- Do not invite or take a student to your home.
- Do not visit students in their home without a specific purpose and express permission of your line manager.
- Do not befriend students on your personal Facebook account.
- Do not use your personal mobile phone to contact students or allow students to contact you outside working hours.
- Do not under any circumstances use any physical punishments or actions towards students including locking of classroom doors.
- Do not arrange meetings outside working hours. Do not develop social relationships with students. If you come into contact with a student in a social setting maintain professional boundaries Pay attention to your own behaviour in such a setting.
- Do not buy goods from or use the services of students or their friends unless in an educational setting for a specific purpose.

- Do not accept any money or gifts from students. Tell students of the Skills4Stem policy and ensure that the student does not feel offended.
- Do not give money or gifts to students including cigarettes.
- Do not lend or borrow money from students. If you are in doubt as to whether a proposed action is consistent with safe conduct you should err on the side of caution and consult your line manager.
- Do not discuss your personal life / experiences with students or express overt distress / anger in front of them.
- Do not express thoughts or feelings towards a student which may be construed as embarrassing, humiliating, intimidating or threatening.
- Avoid over sympathising with students who disclose e.g. that happened to me etc.
- Always refer on, do not get overly involved with any safeguarding issue – this will help to maintain the educational standards in the classroom and support the student in finding other safe spaces to talk through their troubles if they wish, away from the learning environment.

Appendix 14:

Skills4Stem Looked After Children, Care Leavers, Young Carers & Young Parents Policy 2018 – 2019

Author: Sarah Davis, May 2019 v2

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1. Introduction

At Skills4Stem we believe that all children and young people have the right to an education, regardless of their home circumstances, based on equality of opportunity, corporate and fundamental values.

Skills4Stem aims to provide all learners with an equal opportunity, irrespective of gender, racial or ethnic origin, nationality, religion, marital status, age, disability, learning difficulties, sexual orientation or preference, unemployment, language, culture or social background, to access a positive educational experience and to reach their full potential.

Skills4Stem vision for Looked After Children, Care Leavers, Young Carers and Young Parents is to provide them with the necessary support, guidance and opportunity in order to achieve and progress to further/higher education and/or training or employment as well as preparation for wider life experiences in modern Britain.

We acknowledge that there are likely to be Looked After Children (LAC), Care Leavers (CL), Young Carers (YC) and Young Parents (YP) among our students, and that often there are additional barriers to their educational success and progression.

Skills4Stem recognises the considerable underachievement of these minority groups in comparison to their peers. We also recognise that all Looked After Children (LAC), Care Leavers (CL), Young Carers (YC) and Young Parents (YP) can be especially vulnerable, be at risk of early withdrawal, face different issues and require different levels of support. We aim to meet with the students in these cohorts to discuss how we can best support them while they are with us.

The aims of this guidance is to enable us to relieve some of the worries which these particular students may have about balancing home, work, and education and training and to show our support in providing a meaningful and flexible educational experience to ensure they achieve their learning goals and make progression into further education and employment.

Responsibilities

- The CEO is responsible for ensuring a review of the policy.
- The Head of Quality & Compliance will ensure staff and students are appropriately supported and ensure that the designated coordinator receives appropriate support.
- The Quality Manager is responsible for delivering a confidential, ethical and professional service.
- All Skills4Stem staff will ensure that Looked After/ Care Leaver / Young Carer and Young Parent students in need of support are appropriately referred.

Skills4Stem is committed to:

- Making staff and students aware of who our LAC, CL, YC and YPs are and the barriers they may face in their education.
- Making Skills4Stem staff aware of the possible indicators of risk of early withdrawal or difficulties in meeting course and / or Skills4Stem requirements.
- Contributing to Personal Education Plans (PEPS) and Care Plans in liaison with Local Authority colleagues.
- Clarifying the support and advocacy available in Skills4Stem and through external agencies.
- Valuing the views of carers and parents. We firmly believe in developing strong partnerships with carers, parents and residential care workers to enable students to achieve their potential.
- Developing close relationships and collaborative work to promote the learning and wellbeing of individual students, both in and out of education & training.

Responsibilities of the Quality Manager

The role of the Quality Manager, referred to within this document, will:

- be an advocate for Looked After Children, Care Leavers, Young Carers and Young Parents
- Liaise closely with the relevant teachers/trainers and assessors to:
 - ensure a smooth and welcoming induction for the students (and parent/s where possible)
 - note any specific requirements are logged, including care status, on Infusionsoft
 - ensure that each identified has an identified member of staff that they can talk to, and knows how to contact them
 - ensure a PEP is completed within the first half term of the course
 - ensure if the LAC or LC is “At Risk” of leaving the course early due to poor attendance or behaviour, that they will be supported in any formal process to confirm appropriate flexibility has been applied
 - ensure accurate and timely data is provided to the Head of Quality & Compliance including full retention, success and progression data
 - co-ordinate support for the identified students and liaise with other professionals as necessary
 - ensure staff receive relevant information and training
 - ensure confidentiality for individual students and only share personal information on a need to know basis
 - provide information to assist planning/review meetings and ensure attendance as far as possible
 - encourage identified students to participate in planned extra-curricular supportive activities
 - seek urgent meetings with relevant parties if the student is experiencing difficulties and/or

is at risk of early withdrawal

Responsibilities of All Staff

As with all students, staff should:

- consider the impact of any actions on students' fundamental rights and understand the duty to teach students to behave in ways that ensure their rights, and the rights of others, are upheld
- have high aspirations and celebrate the educational and personal achievement of students identified in this document; namely Looked After, Care Leavers, Young Carers and Young Parents
- ensure appropriate entry to examinations for these students
- be familiar with this Policy and Guidance and respond appropriately to requests for information to support the completion of learning and action plans and other documentation needed as part of review meetings
- liaise with the relevant staff (Quality Manager or Head of Quality & Compliance) if an identified student is experiencing difficulty or at risk of early withdrawal

Our policies and practices are free from unlawful discrimination and comply with current legislation:

- *Children Act 1989*
- *Children Act 2004*
- *Section 175 Education Act 2002*
- *Dfee Circular 0269. 2000*
- *Dfee / DoH Guidance 2000*

2. Looked After Children and Care Leavers

In UK law, children in care are referred to as '*looked after children*'. A child is 'looked after' if they are in the care of the local authority for more than 24 hours. Legally, this could be when they are:

- living in accommodation provided by the local authority with the parents' agreement
- the subject of an interim or full care order or, in Scotland, a permanence order
- the subject of an emergency legal order to remove them from immediate danger
- serving time in a secure children's home, secure training centre or young offender institution
- unaccompanied asylum-seeking children.
- They might have been placed in care voluntarily by parents struggling to cope.

A child will stop being 'looked after' when they are either adopted, returned home or turn 18. The local authority will continue to support children leaving care at 18 until they reach 21.

The term 'care leaver' refers to a young person under the age of 25 who is currently or has been in public care for a minimum of three months, since the age of 14, and was in care on their 16th birthday. Public care includes but is not limited to:

- foster care
- semi-independent living
- residential care homes.

The Children Act 2004 places a duty to safeguard looked after children, to promote their educational achievements and to ensure that they can “achieve to and reach their full potential”. The Guidance sets out six key principles:

- prioritising education;
- having high expectations;
- inclusion – changing and challenging attitudes;
- achieving continuity and stability;
- early intervention – priority action; and
- listening to young people.

Support for Looked After Children and Care Leavers

At Skills4Stem we recognise the additional support that Looked After Children and Care Leavers may need in order to feel able to apply and complete their studies. A high proportion of Looked After Children have special educational needs and their emotional and behavioral health can often be a cause for concern.

Skills4Stem recognises that LAC and CL students are statistically much more likely to have a poor attendance record and are up to 5 times more likely to be excluded than their non-looked after peers.

Skills4Stem will take specific steps to monitor the attendance of these students and will notify all appropriate colleagues and partners at an early stage if there is an indication that problems with attendance might occur.

Skills4Stem will take all reasonable steps to ensure that exclusion is rarely used for these students and is used only as a last resort, after all other avenues have been explored.

Care experienced students will be supported by the Quality Manager who can be accessed prior to joining the programme, throughout the programme and to support progression.

It's critical that children in care are helped to develop strong, trusting and stable relationships with their carers, social workers and other professionals including staff.

We will work with assessors, teachers/trainers, line managers and other relevant staff to ensure they are aware of and sensitive to students' needs. We will work with the student to help them access the following:

- Additional Learning Support
- Careers and Progression Advice
- Counselling
- Financial Support
- Transport Support and Advice
- Liaison with appropriate agencies

- Advocacy for a range of situations including entry and on course requirements

-

3. Young Carers

Young Carers are children and young people (under 18) whose lives are affected by looking after someone at home. They are carrying out tasks and responsibilities, which are additional to those appropriate for their age. The person they look after may have one or more of the following:

- Physical disability
- Mental health issues
- Learning difficulties
- Alcohol or drug misuse
- Long-term illness

The person they care for may be a parent, sibling, or grandparent and the care they give may be physical and/or emotional.

Young Carers' responsibilities may include:

- Personal care (e.g. bathing, dressing, feeding)
- Giving or prompting medication/injections
- Shopping
- Housework
- Emotional support
- Looking after younger siblings
- Budgeting and paying bills

Young Carers can feel tired, worried and isolated. Their social life is often restricted with few opportunities for fun and after training activities.

Typically, students do NOT disclose that they are carers and therefore do not always access the support available.

FACTORS WHICH MAY INDICATE THAT A YOUNG PERSON IS CARING INCLUDE:

- Illness or disability in the family
- Being late or absent (due to caring responsibilities at home)
- Assuming a parental role to other siblings
- Poor concentration and/or often tired
- Academic performance below potential
- Homework often uncompleted
- Isolation from peers or problems interacting with peers
- Not making use of out of Skills4Stem activities
- Mature and responsible but maybe 'letting go' and behaving immaturely when in a safe environment
- Behavioural problems
- Limited contact with Skills4Stem by parents
- Being bullied

If we believe that someone is a young carer we will be sensitive when we approach them about this, as we appreciate they may not want their peers to know. Before passing this information on to relevant colleagues we will obtain the consent of the young carer.

Support for Young Carers

The law has changed for young carers. From April 2015 a social worker from the local authority must carry out a “young carers needs assessment” to decide what kind of help is required and whether it is appropriate for the young person to care for someone else – and this includes taking into account whether they want to be a carer. The local authority must also look at the education, training and leisure opportunities and the young person’s views about their future. When assessing a young carer they must always ask about their wishes and involve them, their parents and anyone else they or their parents want to be involved. This could be a member of Skills4Stem staff.

Skills4Stem designates the Quality Manager as having specific responsibilities for Young Carers and they can be accessed prior to joining Skills4Stem, throughout their programme and for progression support.

We will make sure all students and staff know who the Quality Manager is through our internal communication and marketing materials.

We will work with assessors, teachers/trainers, line managers and other relevant staff to ensure they are aware of and sensitive to Young Carers’ needs. We will work with the student to help them access the following:

- Additional Learning Support
- Careers and Progression Advice
- Counselling
- Financial Support
- Transport Support and Advice
- Liaison with appropriate agencies
- We will offer information for Young Carers regarding FE/HE and financial advice. We will aim to provide a career information session at the start of the academic year.
- We will avoid stigmatisation or labelling of students who are carers & provide guidance on preventing bullying. We will demonstrate this through promotion of values and equality & diversity
- We will be sensitive to differences around cultural needs, including those of refugees / asylum seekers.
- Skills4Stem will ensure that measures are in place for inter-agency work to support Young Carers, including child protection & safeguarding procedures if required. Our safeguarding policy highlights safeguarding procedures and relevant safeguarding persons within the Skills4Stem. These policies are regularly reviewed on an approved cycle.

Referrals

It is important to refer to Quality Manager, via email.

4. Young Parents

Although sexual activity in itself is no longer an offence over the age of 16, young people under the age of 18 are still offered the protection of Child Protection Procedures under the Children Act 1989.

Consideration still needs to be given to issues of sexual exploitation through prostitution, and abuse of power. Although they may be over 16, young people under the age of 18 are not deemed able to give consent if the sexual activity is with an adult in a position of trust/authority, or a family member as defined by the Sexual Offences Act 2003.

At Skills4Stem, students will be supported to remain on course and achieve their qualifications, which will improve their employability prospects or chances, to progress to higher-level qualifications and will contribute to the life chances of the students and their children.

Young parents are under 18 years old and may be:

- Pregnant
- A young mother
- A young father

At Skills4Stem we designate the Quality Manager as having specific responsibilities for Young Parents and they can be accessed prior to joining their programme, throughout their programme and to support progression.

Disclosure of pregnancy:

In the event of a disclosure, staff will:

- Listen to the young person without judgement. Ask: Has the pregnancy been confirmed? Do they need any support with getting the pregnancy confirmed? Who else have they spoken to?
- Encourage the young person to tell their parents, and offer support to do this BUT DO NOT INSIST and respect confidentiality
- Discuss with young person regarding sharing information with their peer group and or staff
- Inform the the Designated Safeguarding Lead or the Designated Safeguarding Co-ordinator.and discuss any safeguarding concerns

What we don't do

- Judge!
- Try to counsel about options e.g. continuing with the pregnancy, termination or adoption
- Phone parents
- Phone social care, unless the girl is under 13 or there is concern about coercion, grooming or abuse or any other safeguarding issue, in which case refer immediately to DSC Designated Safeguarding Coordinator
- Discriminate/ exclude on the basis of pregnancy or parenting

Support for Young Parents

We will make sure all students and staff know who the Quality Manager is through our internal communication and marketing materials.

- We will work with assessors, teachers/trainers, line managers and other relevant staff to ensure they are aware of and sensitive to Young Carers' needs. We will work with the student to help them access the following:
- Additional Learning Support
- Careers and Progression Advice
- Counselling
- Financial Support

Information supplied by: Skills4Stem Ltd. 38 Mill Street, Bedford MK40 3HD

www.skills4stem.com

- Transport Support and Advice
- Liaison with appropriate agencies

Plus:

- Pregnant students and young or new parents will be monitored so accurate reports can evidence success and progression.

Students disclosing pregnancy:

- Will be treated with respect and confidentiality regarding their wishes about informing parents and support agencies of the pregnancy, except:
- If sexual exploitation is suspected, the safeguarding team MUST be informed and appropriate continued measures must be made
- Will be referred to the Young People’s Support Services and provide support and continued liaison throughout antenatal and postnatal phases
- Will be supported support through ‘Care to Learn’ applications
- Will be authorised for absence for ante natal appointments / scans including young fathers’ attendance
- Will be assisted in planning for any activities which have to be missed due to pregnancy or parenting
- Will be assisted in planning flexible timetables where possible and necessary
- Will be treated sympathetically if suffering competing pressures of pregnancy, parenting and educational examinations.
- Will be considered in terms of Health and Safety issues and appropriate protection actions will be taken

Health & Safety, Risk Assessment

Fill in a risk assessment for a young person’s pregnancy, in the same way as you would for a member of staff

- Young parents should take a level of personal responsibility for own health and safety and commit to stay in education and training until 38 weeks pregnant if fit and well and no concerns from midwife or doctor
- Risk assessment should include of suitability of programme /work achinery
- Avoid chemicals and radio waves, or risky situations
- Be aware of risk of chickenpox /measles etc... or if the young parent to be has health concerns e.g. diabetes, epilepsy
- Flexibility to leave lessons early/ late when heavily pregnant
- Extra consideration for exams
- Monitor for signs of increased violence if concerns already about home / relationship
- Dietary needs (ensure student is accessing Free School Meals (FSM) If they are entitled
- Assess basic risks such as carrying heavy bags, busy times in corridors and on stairs, frequency on trips to toilets etc.

5. Useful Contact Details

Contact name	Job title	E mail	Phone numbers
Tracy Butler	Operations Manager	tracy@skills4stem.co.uk	0333 939 8445 or

Information supplied by: Skills4Stem Ltd. 38 Mill Street, Bedford MK40 3HD

www.skills4stem.com

			01234 969309
Ruth Exelby	Quality Manager (Designated Safeguarding Co- ordinator)	ruth@skills4stem.co.uk	0333 939 8445 or 01234 969309

Appendix 15:

Guidance for staff supporting transgender students

This guidance aims to provide advice to tutors and teaching staff who are supporting a student who is changing gender identity (transitioning) or has already changed to their chosen gender. The decision to transition to a different gender is a major step for any individual and the support of staff and students is crucial. A flowchart in Appendix A is provided to give an easy to see chart of the steps needed. Each individual will be different so while this guidance covers key points it is important to be flexible and to adjust to the circumstances of the student concerned.

Values and support

Skills4Stem is committed to a culture where all students do not experience discrimination or harassment and will fully support a student who wishes to change gender. The promotion of a respectful and inclusive community is one of our core values.

Skills4Stem recognises that the issues around a change of gender can raise concerns for the student involved and for other staff and students. The aim is to provide a learning space where concerns can be discussed in a supportive way while maintaining appropriate confidentiality.

Some people transition from one gender to their preferred gender with ease but others may take an extended time. Some people will transition to the preferred gender full time while others might choose to live in their preferred gender part time. There are many reasons why a person may not transition permanently to their preferred gender and it is important for Skills4Stem to be flexible and supportive and stand clearly against any discrimination or harassment.

Terminology

A brief guide to some of the key definitions is given in Appendix B.

Applicants

If an applicant has fully transitioned before applying to Skills4Stem will always treat the student as being of the acquired gender.

First steps - Declaring an intention to transition

A student may approach a member of Skills4Stem staff to state their intention to transition. At this point the first steps are to:

- Make it clear that Skills4Stem will fully support the student.
- Arrange a meeting to discuss how Skills4Stem can support the student and invite the student to bring a friend/mentor if they wish.
- Notify the appropriate colleagues – Head of Quality & Compliance and/or Quality Manager

Supporting a student who is transitioning – meeting and action plan

The purpose of the support meeting is to agree an action plan with timescales to support the student which will cover the practical issues and manage the reactions of other students and staff.

Areas to discuss and include in the action plan:

- The date of transition - agree the point when the student will begin to live day to day in the acquired gender
- Name – once the chosen name is available it should be used all the time along with the appropriate pronoun (he or she) for the chosen gender. If you are not sure about names and pronouns, ask the person for their preference
- Legal proof of name change – a statutory declaration of name changes or deed poll - to allow Skills4Stem to make changes to the student's registered name
- The date Skills4Stem will change the name and gender on all student records and public references – email address, contact details, academic records - and who is responsible for this
- Confidentiality – it is important to keep any records relating to a change in gender completely confidential and any documents relating to name changes and records of absence for medical assistance should be placed in a sealed envelope and marked with instructions to keep them confidential
- A gender recognition certificate gives the right to request that all references to a former name and gender are removed and records changed - eg letters replaced with new letters in the new name, meeting minutes changed and so on. All records on paper files must be found and replaced with new records
- How and when other students and staff will be informed of the decision
- What briefing or training for students and staff might be helpful and who will provide this
- Arrangements for the time off required for appointments, surgery or recovery from surgery where appropriate. This can vary greatly depending on the individual and the type of transition the student has chosen
- Allowance for any side effects of medication – e.g. temporarily reduced hours
- Ways to minimise the impact on the student's progress – e.g. adjustments to attendance and assessment deadlines, providing extra support, whether a student might wish to defer part of a programme
- Single sex facilities – the student should have access to the changing rooms and toilets of the acquired gender. Consult the student on how helpful it might be to discuss and explain this to other students and staff who use the facilities.
- It is not acceptable to restrict the student to the use of unisex/disabled facilities, though the student may choose to use these initially.
- Let the student know about the support available any local community groups for trans people and counselling services. (See appendix C)
- The route for reporting any problems should be agreed e.g. via Quality Manager
- Dates for reviewing the progress of the action plan

Managing the reactions of students and staff

The student may wish to tell the other students and staff about the plans to transition individually or may choose to have a chosen representative do this.

It could be helpful to arrange meetings with the students and staff who interact with the trans student. Additional training and support can also be provided in consultation with the student.

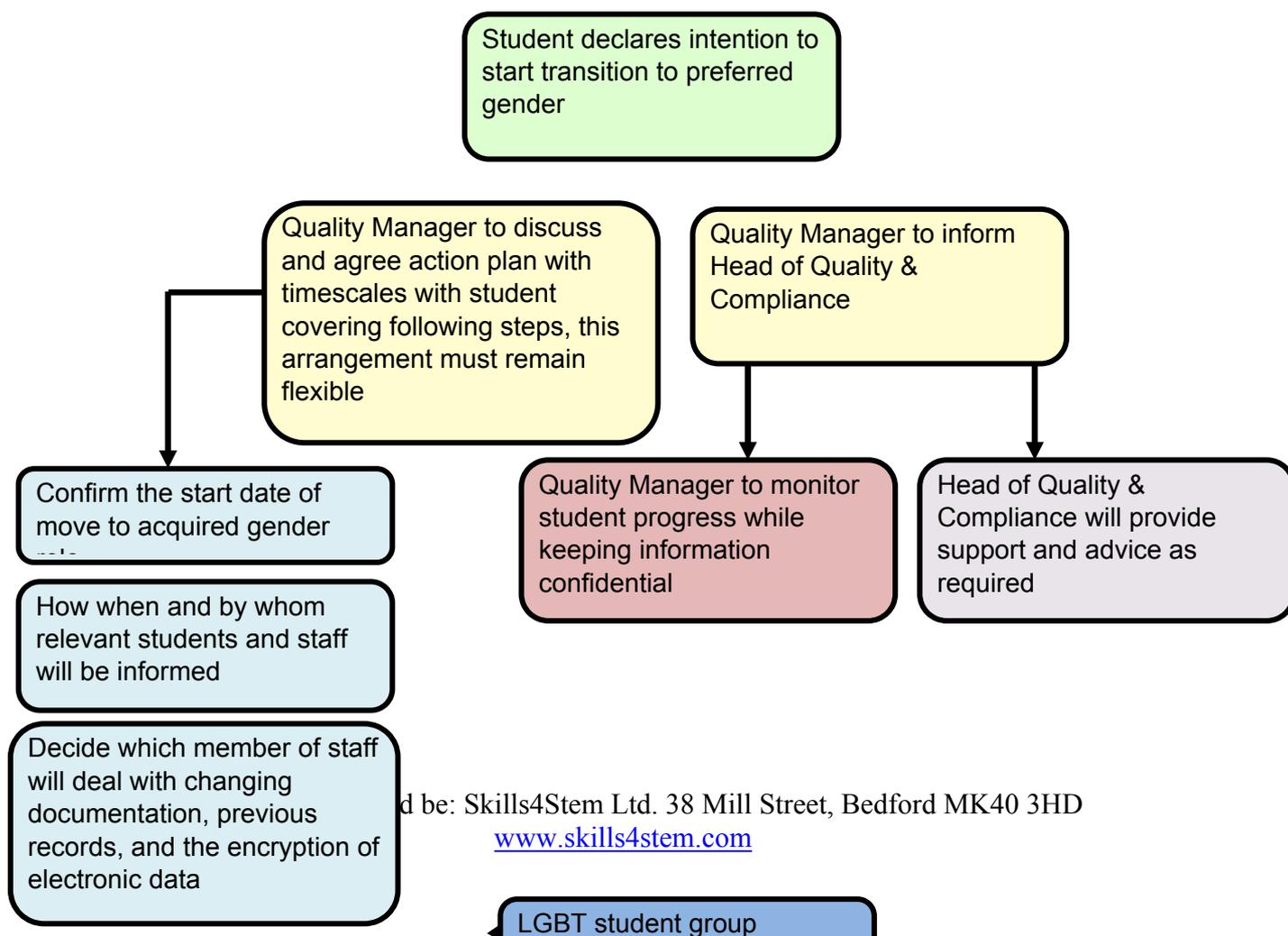
Guidance can be circulated to staff and students – though no individual details should be circulated by email.

There should be an opportunity for students and staff to ask questions or raise any issues.

Remind staff and students that information concerning a person's gender recognition is confidential and 'protected information' which should not be disclosed to a third party without the trans person's consent.

Appendix A

Gender identity – student flowchart



Appendix B

Terminology

The terminology concerning transgender is evolving as the perceptions and understanding of this area are changing. This is a basic guide to some of the common usages.

Acquired gender

The chosen/preferred gender of a person who has changed gender by socially transitioning and having their gender reassigned or by legal recognition of the new gender. This can be with or without medical assistance.

Gender

The female or male role that a person lives and interacts with others in the community.

Gender identity

The gender that is the internal perception and experience of an individual. Some people experience a gender identity that does not match or is inconsistent with their birth/anatomical gender.

Gender variance

A person with gender variance may feel that their gender identity is different from their birth gender or anatomical gender. The sex differentiation of the brain may be inconsistent with the birth gender and the person can experience anxiety and uncertainty over their birth gender. The person does not have the stereotypical gender experience and expression.

Gender presentation

The appearance, clothing and personality on show that shapes the perceptions of others on the gender of the individual.

Gender reassignment

The process to acquire a new gender which can include social, legal and medical adjustments.

Real-life experience

The period when an individual lives, studies and works in the acquired gender before they can start medical treatment.

Trans people or transgender

An inclusive term used for people whose gender experience lies outside of the conventional gender boundaries.

Transition

The permanent change of gender role in the social, learning and work aspects of life. Some people make an overnight change while others do so gradually over a period of time.

Appendix C

Useful links and further information

GIRES

Gender Identity Research and Education Society

<http://www.gires.org.uk/>

The Gender Trust

Support, information and advice for anyone with any question or problem concerning their gender identity

www.gendertrust.org.uk

Mermaids

Support for young people with gender identity issues

<http://www.mermaidsuk.org.uk/index.php/links/support-groups>

Transgender Information

<http://mesmac.co.uk/leeds-community-groups>

<http://www.gendernetwork.com/westyorkshireorganisations.html>

<http://safetuk.org/>

http://www.safenetwork.org.uk/training_and_awareness/Pages/supporting-lgbt-young-people.aspx

Promoting transgender equality e learning resource

Learning and Skills Improvement Service

http://dev.bdpstaging.co.uk/trans_equality/index.php?i=123

Guidance on trans equality in post-school education

Produced by Press for Change for the Forum on sexual orientation and gender identity and published by Unison

<http://www.unison.org.uk/file/A7002.pdf>

Promoting transgender equality in further education

Learning and Skills Improvement Service

<http://www.lsis.org.uk/Services/Publications/Documents/LSIS-Transequality-Briefing.pdf>

Trans staff and students in higher education – revised 2010

Equality Challenge Unit

<http://www.ecu.ac.uk/publications/files/trans-staff-and-students-in-he-revised-2010.pdf/view>

Appendix 16: Do we need this?

FREEDOM OF SPEECH & GUEST SPEAKER CODE OF PRACTICE 2019 – 2020

Author: Sarah Davis, CEO

Date for review: May 2020

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1. INTRODUCTION

Freedom of speech and expression is an important feature for educational institutions, where the freedom to express ideas and opinions is a fundamental principle. At the same time, all such freedoms are subject to limitations under the law, to protect the rights and freedoms of others. All education providers have certain legal and regulatory obligations to protect freedom of lawful speech and expression and this code of practice acknowledges the fundamental right of freedom of speech.

Those legal obligations are found in the Education Act 1986, the equality Act 2010 and the Counter Terrorism and Security Act 2015.

Student and staff welfare are at the heart of Skills4Stem's policies and protocols. The freedom to express views can sometimes be tempered with the need to protect students, staff and communities from risk of harm. Skills4Stem therefore needs to ensure that, where there is potential for these rights to come into conflict with external speakers, appropriate actions are taken to mitigate those risks and ensure the safety of Skills4Stem students and staff and the wider community.

Though relatively few in number, external speakers can create a disproportionately negative reaction from the media and other sectors where they are seen to contravene aspects of the Equality Act or where they 'impose' prior conditions to their talk such as a requirement for segregated audiences.

This code of practice is designed primarily to support the safeguarding and well-being of students and staff and to also reduce the risk of adverse publicity for Skills4Stem.

This code of practice should be used in conjunction with the following:

- Safeguarding Guidance
- Student Charter: Equality Guidance; Code of Behaviour; Bullying & Harassment Guidance; Use the internet safely; Keeping Safe: A guide to safeguarding for students
- Positive Behaviour procedures
- Staff Disciplinary, Grievance and Dismissal Procedures
- Code of Conduct, Values and Behaviours
- Health and Safety Procedures

Code of conduct statement.

- The Counter Terrorism and Security Act 2015 requires all further education institutions to have policies and procedures in place for the management of events held on their premises.
- The policies and procedures must apply to all staff, students and visitors.
- The Education (No 2) Act 1986 (the "Act") requires every individual and body of persons concerned in the governance of any further education institution to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for students and employees of the institution and for visiting speakers.
- There is also a requirement that, so far as is reasonably practicable, the use of Skills4Stem premises shall not be denied to any individual or body of persons on grounds connected with the beliefs or views of that individual or any member of that body, or with the policy and objectives of that body.

- The Act further requires the governing body of the institution to issue a code of practice setting out the procedures to be followed by students and employees of the establishment in connection with the organisation of meetings and other activities which are to be held on Skills4Stem premises and the conduct required of such persons in connection with any such meeting or activity.
- Every individual and body of persons concerned in the governance of Skills4Stem is required to take such steps as are reasonably practicable (including where appropriate the initiation of disciplinary measures) to secure compliance with the code of practice.
- In addition, clear guidance is required to students, staff, governors and external agencies as to how Skills4Stem manages freedom of speech as part of its Prevent Duty Guidance and in line with the Counter-Terrorism and Security Act 2015.

1. Scope of the code of practice.

This code of practice applies to all members of Skills4Stem, which includes:

- Members of the governing body
- All employees of Skills4Stem and any subsidiary companies and other organisations /bodies undertaking duties on its behalf
- All students of Skills4Stem (whether full or part-time) throughout the period in which they are formally enrolled at Skills4Stem
- The Students' Union and any of its societies, clubs or associations
- All persons invited to speak or otherwise take part in events to be held on the Skills4Stem's premises in accordance with the provisions of this Code.

References in the Code to "Skills4Stem's premises" mean those premises over which Skills4Stem exercises some degree of control (whether or not those premises are owned by Skills4Stem)

2. Principles of the code of practice.

Skills4Stem will not suppress freedom to express controversial or unpopular views, provided that the expression of those views does not go beyond the articulation of points of view and specifically does not constitute incitement to riot, insurrection, racial hatred, religious hatred, sexual harassment or other activities which are likely to cause a breach of the peace or public disorder or otherwise to be unlawful.

Whilst upholding the principles of freedom to express potentially controversial or unpopular views, Skills4Stem will not permit its premises or resources to be used to promote or support radicalisation or extremism.

In considering whether to allow the expression of potentially controversial or unpopular views, Skills4Stem shall also take account of its wider legal duties, in particular to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by law;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Every person to whom the Code's obligations apply is required to assist Skills4Stem in upholding this Code of Practice.

Encouragement of terrorism and inviting support for terrorist organisations or activities are criminal offences. Skills4Stem should not provide a platform for these offences to be committed.

Skills4Stem shall take such steps as are reasonably practicable, including where appropriate the initiation of disciplinary measures, to secure compliance by groups or individuals with their obligations under this Code of Practice.

3. Operational implementation of the Code

Skills4Stem has the right and the power to regulate and, if necessary, to impose conditions or restrictions upon events and activities taking place on its premises.

Skills4Stem managers and teaching staff are responsible for ensuring that the principles underpinning this Code are taken into account in the planning of teaching and learning activities.

In addition, any off-site event (i.e. one taking place away from Skills4Stem's premises) held in Skills4Stem's name or on its behalf must, as far as reasonably possible, be organised and managed in compliance with the principles underpinning this Code.

For any other events or activities (particularly meetings and demonstrations) which are not part of the approved academic course content or officially authorised business of Skills4Stem where it is expected, or reasonably foreseeable, that the event/activity will raise controversial issues, prior approval for use of Skills4Stem premises and or resources must be secured in accordance with the Event Approvals Procedure which accompanies this Code.

4. Sanctions and Penalties

Skills4Stem shall be entitled to take action, under the relevant disciplinary procedure, against any person who breaches this Code.

In addition, if an offence is allegedly committed at or in connection with an event or activity to which the provisions of this Code apply, Skills4Stem may take steps to assist the police in identifying any persons committing offences with a view to appropriate action being taken against them.

5. Code Review and Amendment

Skills4Stem shall, in accordance with its obligations under section 43 of the Education (No. 2) Act 1986, periodically review and, where necessary, update this Code. Review periods will be no longer than three years.

6. Procedures

The following procedure applies to events and activities which are not deemed (by the relevant Skills4Stem management teams) to be part of Skills4Stem's internally-authorized teaching and learning activity.

Formal approval by Skills4Stem must be obtained, in advance, for any event to be held on Skills4Stem's premises (whether or not an external speaker is involved) where it is expected, or reasonably foreseeable, that the event will raise controversial issues which may risk infringement of or non-compliance with Skills4Stem's Code of Practice on Freedom of Speech.

Formal approval must also be obtained for any events which are Skills4Stem affiliated, funded or branded but which take place away from Skills4Stem premises.

Examples of such events include, but are not limited to, meetings or gatherings where the topics to be covered include social, political or religious issues which are known or can be reasonably expected to invoke fiercely opposing views.

To seek formal approval, the organiser(s) of the event must submit a written request (using the Event Request Form at Appendix 1) for consideration. The request must be submitted not less than 20 working days before the proposed date of the event, to a designated approving manager ; Quality & Learner Experience. The AP Quality and Learner Experience may delegate to the Head of Student Support.

In the event of any doubt as to whether a proposed event might require approval under this procedure, the organiser(s) of the event shall consult the approving manager or the delegated substitute at the earliest opportunity so that the correct procedures may be followed.

In considering whether to approve the event request, the approving manager or delegated substitute shall take account of actual and potential risks associated with the event, which may involve the completion of a formal risk assessment. The risk assessment will be carried out by Health & safety and the safeguarding team.

The approving manager or delegated substitute shall decide whether the request to hold the event is: approved, or approved with conditions, or rejected.

The approving manager or delegated substitute shall seek to provide written confirmation via email of their decision to the event organiser(s) within 5 working days of receiving the written request. However, the approving manager or delegated substitute may require more time to reach their decision; in such circumstances, the decision will be communicated as quickly as circumstances allow.

Reasonable grounds for refusal include, but are not limited to, consideration by the approving manager that the event may:

- incite those attending to commit a criminal act;
- lead to the unlawful expression of views including extremist views that risk drawing people into terrorism;
- be in direct support of an organisation which is proscribed or whose aims and objectives are illegal;
- be likely to give rise to a breach of the peace or other public disorder; or
- undermine Skills4Stem's reputation or its values, or compromise its ability to comply with its legal and regulatory obligations as a charity and as a further education institution.

In determining whether the holding of an event on Skills4Stem's premises might reasonably be refused, consideration will also be given to:

- the safety of persons attending the event and persons on Skills4Stem's
- premises who might foreseeably be put at risk;
- the security of Skills4Stem's premises; and
- the reputation of Skills4Stem.

It is the ongoing duty of any person involved in organising a meeting or other activity, and also the duty of any person responsible for processing the booking of rooms in Skills4Stem, to inform the Assistant

Quality & Learner Experience, or Head of Student Support, or Head of Health & Safety, if there are reasonable grounds to believe that the activity may be disruptive, for example, by reason of:

- the status of the speaker;
- the nature of any of the subjects to be discussed;
- the views or beliefs (whether or not related to the activity) of any person attending;
- the coincidence of the activity with another activity;
- the personal safety or property of any person attending may be at risk by reason of their involvement in the activity;
- intimidation, duress, or harassment might be applied to any person in an attempt to prevent their attending the activity;
- the activity might be picketed.

If the decision of the approving manager or delegated substitute is to approve the request with conditions, or to reject the request, the organiser(s) shall be entitled to submit an appeal against the decision. Any such appeal must be submitted in writing to Skills4Stem CEO.

The decision of the CEO shall be final and there shall be no further mechanism for appeal within Skills4Stem.

In refusing an event request, Skills4Stem shall have no liability to the organiser(s) of the proposed event for any costs or other obligations incurred by the organiser(s) in connection with the proposed event.

Authorised events must have named persons supervising the event.

While an event is in progress, Skills4Stem shall have the right to require the organisers to terminate the event if the conduct of the event gives rise to concerns for Skills4Stem that the safety of persons attending cannot be reasonably guaranteed, or that a breach of the law or a material breach of this Code or any of the conditions imposed in the event approval process is likely to occur

Request to book External Speaker

A member of Skills4Stem may make a request to invite an external speaker or hold an event which is not part of the curriculum plan for teaching and learning. This form must be completed and sent to

Information about who is making the request.			
Skills4Stem member organising the event		Department and position	
Phone number inc extension		e-mail	
Number of attendees expected		Is this a Students' union activity? (please circle)	Yes / No
Information about the event			
Proposed date and start and end times		Proposed location	
Purpose/topic of proposed event			
Proposed speakers/presenters			
Is the event likely to attract media interest – if so why?			
Information about speaker(s)/presenter(s)			
Full name			
Home address			
Telephone/mobile		email	
Occupation			
Speaker's website,			

Information supplied by: Skills4Stem Ltd. 38 Mill Street, Bedford MK40 3HD

www.skills4stem.com

other social media links	
Where did you hear about this speaker? Please give details.	

Organiser's Declaration

I declare that the information provided here is, to the best of my knowledge, a true and accurate statement of intentions and requirements.

I/we understand and accept that this event request is made under the provisions of Skills4Stem's Code on Freedom of Speech, and I/we agree to comply with that Code in the event that permission to hold this event is granted.

Signature(s) _____
