

# **Safeguarding and Prevent Policy 2024 -25**



Our Newham Learning & Skills  
Part-time adult education

Safeguarding and Prevent Policy
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## 1. Overview of ONLS commitment to safeguarding

### 1.1 Policy Aims

- Protect children, young people and adults at risk who take part in ONLS programmes and activities.
- Provide all users with the overarching principles that guide our approach to safeguarding.

Provide staff with the guidance to make informed and confident responses to specific safeguarding adult issues with due regard to the Principles of the Care Act 2014

- Empowerment: People being supported and encouraged to make their own decisions and informed consent.
- Prevention: It is better to take action before harm occurs.
- Proportionality: The least intrusive response appropriate to the risk presented.
- Protection: Support and representation for those in greatest need.
- Partnership: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability: Accountability and transparency in delivering safeguarding.

## 2. Scope

**2.1** Our Newham Learning and Skills delivers courses to Adults (19+) and provides onsite crèche facilities at three of our centres. We recognise that a learner may be at risk of abuse at any age due to their specific circumstances but may not be at risk at other times or permanently. There are also learners who may not fall into the category of either a 'young person' or an adult at risk of abuse but may require safeguarding at a particular time due to a potentially dangerous situation, set of circumstances or an act/acts carried out against them. Abuse can happen anywhere: for example, in someone's own home, in a public place, in hospital, in a care home or in college. It can take place when an adult lives alone or with others. [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](#)

**2.2** It is important to be aware that the Care Act 2014 introduced a statutory framework for reporting and looking into concerns of abuse of adults at risk. An adult at risk is 18 years or over, has needs for care and support (whether or not the local authority is meeting any of those needs), is experiencing, or is at risk of, abuse or neglect, and as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

**2.3** The [Mental Capacity Act 2005 \(legislation.gov.uk\)](#) presumes that individuals have the capacity to make decisions unless proven otherwise. It also emphasizes the importance of providing support and assistance to individuals to help them make decisions, and it acknowledges that making unwise decisions does not necessarily mean a person lacks capacity. Learners with Special Educational Needs and/or

Disabilities (SEND), may have greater needs in the areas of comprehension, communication, weighing up information and making judgements which can leave them open to being further at risk of abuse.

[Tricky Friends \(youtube.com\)](#)

**2.4** ONLS is committed to safeguarding against all aspects of abuse and neglect and expects ALL who work at ONLS to share this commitment and create a culture of vigilance.

### **3. Role of the Designated Safeguarding Lead (DSL)**

**3.1** The Designated Safeguarding Lead (DSL) is a senior member of staff with strategic oversight as well as day to day responsibility for safeguarding at ONLS including the crèches onsite. The DSL:

- reviews the safeguarding policy at least annually and implementing any required changes,
- ensures that ONLS fulfils its duties under legislation through safeguarding policies, procedures and training,
- ensures all staff training and safeguarding officers training is up to date and relevant,
- ensures Safeguarding Officers are accountable to the standards of the Safeguarding and Prevent policy,
- ensures a robust system for recording and monitoring concerns reported,
- ensures Operational Facilities Lead is accountable to the standards of the Safeguarding Policy and The E-Safety Policy,
- provides guidance and support to staff dealing with complex safeguarding cases,
- maintains communication with the advisory board member with responsibility for safeguarding,
- makes referrals to outside agencies Multi Agency Safeguarding Hub (MASH), LB of Newham Adult Social Care, Police, Local Authority Designated Officer (LADO), Person In a Position of Trust (PIPoT), CHANNEL. (If a decision is made to raise a concern with external services and the DSL is unable to lead on this process (e.g. due to holiday or sick leave) then a Safeguarding Officer will make the referral).

### **4. The role of the Safeguarding Officers**

**4.1** The Safeguarding Officers are trained to DSL level and work closely with the DSL. The Safeguarding officers:

- make referrals to external agencies
- provide advice, guidance and training for staff on safeguarding issues,
- maintain robust records of safeguarding incidents including the actions taken and when the case has been signed off as closed.

- ensure the ONLS safeguarding policy is known, understood and used appropriately.

## **5. The role of All staff**

**5.1** Safeguarding is everyone's responsibility, at ONLS. Senior managers and safeguarding officers have the responsibility to ensure that this policy is understood and followed by all staff.

- All new members of staff must receive a copy of the ONLS safeguarding and child protection procedures as part of their staff induction.
- All members of staff must read Keeping Children Safe in Education 2023, crèche staff must read and sign the declaration to state that they have read Part 1.
- All members of staff must read the Safeguarding and Prevent Policy and be aware of where to use it as a reference. The safeguarding team will support staff in understanding these key documents and implementing them in their practice.
- All staff must attend relevant safeguarding training.
- All staff must know how to spot and respond to signs of abuse, and how to respond to a learner who discloses abuse or any safeguarding matter to them.
- All staff must know how to respond to a learner who displays signs of abuse, neglect or any safeguarding matter.
- All staff must know how to report and respond to a safeguarding concern accordingly

## **6. Role of the Advisory Board**

**6.1** The Advisory Board will receive, and review recommendations submitted and determine/approve any amendments to the safeguarding policies and procedures. The Advisory Board will also note the outcomes of any Safeguarding Adult Reviews and reports from external bodies in determining appropriate safeguarding arrangements to be implemented.

**6.2** A member of the Advisory Board has responsibility for governance of Safeguarding and Prevent. The Advisory Board member with responsibility for the governance of Safeguarding and Prevent attends the annual strategic safeguarding meeting. The DSL provides a safeguarding report to the Advisory board. The Advisory Board is fully committed to ensuring that:

- The Safeguarding and Prevent Policy meets statutory requirements, contains up-to-date information and references and are updated annually;
- The Prevent Duty Risk Assessment is up to date and progress against actions is monitored;
- The Safeguarding and Prevent Procedures Guidance clearly sets out what staff should do if they have a concern about a learner(s);

- ONLS operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children and adults at risk of abuse;
- Staff undertake relevant safeguarding training;

## **7. Overview of commitment to The Prevent Duty**

**7.1** Prevent is an integral part of safeguarding. Under the Counter-Terrorism and Security Act 2015 ONLS is required to “have due regard to the need to prevent people from being drawn into terrorism, violent extremism and non-violent extremism, particularly that which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit”.

**7.2** ONLS recognises its responsibilities under the Prevent duty to facilitate Prevent training. Prevent is one of the four elements of CONTEST, the government’s counter-terrorism strategy. ONLS fulfils its statutory responsibilities by ensuring that all staff recognise that protecting learners from extremism and radicalisation is a key pillar of our safeguarding duties. PREVENT refers to specific elements of the Government’s overarching Anti-Terrorist strategy defined under the section 26 (10) of the Counter Terrorism and Security Act 2015 as part of CONTEST) and includes appropriate references to Channel and other measures.

**7.3** ONLS recognises that some concerns which are identified around incidents of potential extremist behaviours will have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all enquiries where concerns are raised about individuals at risk of being drawn into violent extremism. PREVENT officers from the relevant Police Force will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, other appropriate and targeted support will be considered for the individual.

**7.4** The CHANNEL process is utilised where necessary and appropriate by ONLS to provide learners with access to a confidential and voluntary process where support options can be offered.

## **8. Raising awareness about Prevent**

**8.1** ONLS ensures that learners are taught in tutorials and workshops how to recognise the dangers posed by the activities of extremist groups and to understand how to recognise and protect themselves from the activities of those seeking to radicalise vulnerable people.

**8.2** Extremism is defined in HM Government guidance as: “Vocal or active opposition to fundamental British values...” including calls for the death of specific people or groups. British Values are defined as:

- Democracy;

- The rule of law;
- Individual liberty;
- A mutual respect tolerance for those with different faiths and beliefs.

**8.3** ONLS delivers training in partnership with Newham Council to all staff to ensure that they have sufficient knowledge of contextual safeguarding, British Values, Prevent and radicalisation and exemplify British Values in their work. Lessons, interactions with learners and in their general behaviours. British Values are promoted to learners through embedding them in the curriculum, tutorial and enrichment workshops. Participation in the sessions is registered.

## **9. The types of abuse and indicators**

**9.1** The Care Act 2014, recognises specific types of possible abuse; concerns may involve a combination of abusive elements

- Physical abuse: Inflicting physical harm or injury on an individual, including hitting, slapping, pushing, or misuse of medication.
- Emotional or psychological abuse: Inflicting mental or emotional anguish through verbal threats, humiliation, intimidation, or isolation.
- Sexual abuse: Inappropriate or non-consensual sexual activity or behaviour towards an individual, including rape, sexual assault, or harassment.
- Financial or material abuse: Exploiting an individual financially or materially, such as theft, fraud, coercion, or misuse of property or possessions.
- Neglect or acts of omission: Failing to provide necessary care, support, or assistance to meet an individual's basic needs, leading to harm or deterioration in health.
- Discriminatory abuse: Treating an individual unfairly or unfavourably based on characteristics such as age, gender, race, religion, disability, or sexual orientation.
- Institutional abuse: Systemic mistreatment of individuals within a care setting or institution, often resulting from poor organizational practices, neglect, or lack of adequate safeguarding measures.
- Domestic abuse: Abuse occurring within a domestic or familial relationship, including coercive control, physical violence, emotional abuse, or financial abuse.
- Modern slavery: Exploitation of individuals for labour or services through coercion, deception, or abuse of power.
- Self-neglect: When an individual neglects their own care needs, potentially leading to harm or deterioration in health.



## 9.2 Other forms of abuse may include:

- Domestic violence / abuse– an incident or series of incidents involving violence, verbal, physical, psychological, sexual, financial or emotional abuse including controlling, coercive, threatening behaviour.
- Mate crime – befriending an adult or young person to exploit or take advantage of them.
- Modern slavery – victims of human trafficking, forced labour, domestic servitude, sexual exploitation such as escort work, debt bondage.
- Drugs – the use of alcohol, tobacco, illegal and prescription drugs and other medicines, volatile substances and psychoactive substances (sometimes referred to as “legal highs”)
- Faith abuse – including witchcraft and spirit possession, leading children astray, references to demons, devils, evil eye and the use of witchcraft or magic to produce fear or compliance
- Crime and Violence – in some areas, crime and violence are an integral part of identity and lead to increased antisocial behaviour and levels of criminality.
- Gender-based violence/violence against women and girls (VAWG) – this is a general term covering violence (physical, sexual or otherwise) together with female genital mutilation, harassment and stalking.
- Radicalisation – this is the process which leads to an individual deciding to support terrorism and forms of extremism which lead to terrorism
- Bullying including cyberbullying - bullying can be physical or psychological and can be in person or via text messages or the internet (cyberbullying and virtual bullying) and involves the threat of violence or isolation either physically or online.
- Sexting – this is when individuals create sexually explicit images which are then sent via the internet or through mobile phone messages.
- Disguised compliance - care givers presenting an appearance of being supportive to avoid scrutiny, suspicion, or concern.

## 9.3 Indicators of abuse

Evidence of any one indicator of abuse should not be taken on its own as proof that abuse is occurring. The lists of indicators and examples of behaviour are not exhaustive, and people may be subject to several abuse types at the same time.

[Types and indicators of abuse: Safeguarding adults - SCIE](#)

## **10. Contextual safeguarding**

**10.1** ONLS assesses the risks, issues and themes in local communities and works closely with LBN Safeguarding and Prevent team when delivering training. ONLS considers the wellbeing and safety of its learners. ONLS recognises when a learner is known to Adult Social Care, it is likely to be an indicator that the learner is more at risk and more likely to need help to stay safe. ONLS works closely with the local community to keep abreast of emerging safeguarding concerns in each locality.

## **11. Safer recruitment and selection**

**11.1** ONLS is committed to the principle of safer recruitment, selection and vetting of all staff. ONLS follows the guidance on Safer Recruitment in laid out in Keeping Children Safe In Education (KCSIE) 2023 and the London Borough of Newham Recruitment and Selection Policy. ONLS vets applicants, verifying identity, academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. ONLS will update a Single Central Record and ensure that all pre-employment checks and training are completed prior to staff starting at ONLS. Safer recruitment at ONLS includes:

- An Enhanced DBS (Disclosure and Barring Service) Certificate (with barred list check) is obtained for all new appointments to ONLS.
- Prohibition checks are carried out for all those involved in teaching work.
- All new appointments to ONLS who have lived outside the UK are subject to additional checks as appropriate.
- Part of the interview process includes where necessary questions on gaps in employment history.
- ONLS ensures supply staff and agency staff undergo the necessary checks, depending on the agency checks conducted and the activities to be undertaken.

- Identity checks are carried out on all appointments to ONLS before the appointment is made.
- ONLS maintains a single central record detailing a range of checks carried out on their staff.
- The selection panel will always include a member of staff who has undertaken safer recruitment training.
- Where there is not a panel, the person interviewing will have completed this training.
- Safeguarding questions contributes to formal questions.

**11.2** As part of the shortlisting process ONLS may carry out an online search as due diligence on the shortlisted candidates. ONLS will inform shortlisted candidates of online searches that may be done.

**11.3** If there are concerns about an existing staff member's suitability to work in education, ONLS will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at ONLS moves from a post that was not regulated activity, into work which is regulated activity, the relevant checks for that regulated activity will be carried out.

## **12. Raising learner's awareness about safeguarding**

**12.1** All learners have access to information on policies. All learners have tutorials on safeguarding procedures during their induction and then regularly throughout the year. Learners are informed that there is a senior member of staff with responsibility for safeguarding, and other members of staff with safeguarding responsibility. Learners are informed of whom they might talk to, both in and out of ONLS, their right to be listened to and heard and what steps can be taken to protect them, and others from harm.

**12.2** Learners are also responsible for complying with all ONLS policies and procedures designed to keep ONLS a safe and secure place to learn. Through appropriate tutorials, and the use of [Educate Against Hate - Prevent Radicalisation & Extremism](#) to inform teaching and learning opportunities, enrichment activities and provision of information on display. Learners are taught to understand safeguarding, recognise when they are at risk and how to get help when they need it, including keeping safe in the community and keeping safe online. External agencies are brought in where appropriate to support the delivery of themes as they arise.

## **13. Mental Health**

**13.1** All staff should be aware that mental health problems can be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation. We have four safeguarding officers who are trained Mental Health First Aiders. We recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. If staff have a mental health concern about a learner, it should be raised

as a concern using the ONLS safeguarding reporting procedures. In the case of a Mental Health Crisis, NHS 111 is to be contacted and select 'option 2' in East London.

Learners who disclose mental health concerns at enrolment are recorded securely on the database and tutors are informed. Learners are made aware that the information is recorded and shared with tutors. Learners who are known to services are encouraged to continue using the external professional services available to them.

## **14. E- safety**

**14.1** ONLS reviews its approach to ICT and online safety annually and its response to the growing dangers faced by staff and learners. All staff receive training on safe use of ICT and online safety as part of their induction. Learners attend bespoke awareness raising tutorials aimed at safeguarding them and their families. The safeguarding policy is supported by the ONLS E-Safety Policy. During induction learners are required to read and agree to the Acceptable Use of IT Policy that forms part of the learner agreement. The range of issues classified within online safety is considerable, but can be categorised into four key areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

## **14.2 Filtering and monitoring**

**13.2.1** All staff must receive training in the expectations, applicable roles, and responsibilities in relation to filtering and monitoring of online content. All staff and learners must ensure their laptops are locked when they are away from their desks, to not do so is potential disciplinary matter. The operational facilities lead takes responsibility for understanding the filtering and monitoring systems and processes in place on all devices and networks in line with guidance from the Department for Education's new filtering and monitoring standards (DfE (Department for Education), 2023b) and the DfE's Cyber security standards for schools and colleges (DfE 2023c).

**14.2.2** All staff and learners who access the WIFI on ONLS systems using personal devices will have the same DfE's Cyber security standards for schools and colleges (DfE 2023c) applied to their usage.

**14.2.3** All our ONLS phones record conversations for safeguarding purposes (up to 90 days), the only calls not recorded are those to emergency services. All staff are notified of this monitoring.

**14.2.4** ONLS Broadband across all sites is supplied by London Grid for Learning and web filtering is managed by Newham Partnership Working – The Education Space. All web filtering is set up in agreement with ONLS management and all sites set up for educational access.

**14.2.5** ONLS has an obligation to ensure that they keep up to date with all current guidance and changes throughout the year. The DSL will review the standards annually and discuss with the ONLS Operational Lead and service providers what needs to be done to support ONLS in meeting this standard.

## **15. Sexual harassment and sexual violence**

**15.1** ONLS has a zero-tolerance policy on sexual harassment in any form, including online and social media, such as 'sexting' and the sharing of unsolicited images and online bullying. ONLS is committed to supporting learners who experience any form of sexual violence, sexual abuse, domestic violence, or online abuse. All staff receive training and are sensitive to the needs of those making disclosures and respect their right to be taken seriously.

**15.2** Learners making disclosures are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.' All reports of sexual abuse, assault or rape are to be reported to the police, as they are a criminal offence, and it is the police who investigate not ONLS. The Department of Education updated their advice in 2021 for schools and colleges. As part of our safeguarding duties, ONLS ensures that learners are made aware that some forms of online activity such as non-consensual sharing of images and videos are not only 'abusive' but are in fact illegal. This law covers explicit media online and offline so this can include WhatsApp, text messages, Instagram or the distribution of photographs or disks. The advice of the UK Council for Internet Safety (UKCIS 2020) is followed by ONLS in raising awareness of online abuse and in managing incidents.

**15.3** ONLS actively works to minimize the risk of abuse by ensuring that all learners are aware that there is a zero-tolerance approach to abuse. In no circumstances is it ever acceptable for abuse to be passed off as 'just banter' or 'just having a laugh'. Staff are alerted to any signs of it and are confident in challenging unacceptable behaviour immediately and following the ONLS safeguarding processes.

**15.4** Staff are aware they must follow all reporting procedures, as set out below, including in the cases of disclosures of abuse, sexual assault or rape, the additional steps of:

- call the DSL or Head of Service
- DSL or Head of Service must call the police immediately
- the Police must be notified of the sexual allegation
- the Head of Service and the safeguarding Advisory board member must be made aware
- support for the learner must be put in place or offered.

## **16. Creche**

**16.1** ONLS has a crèche on 3 sites that provides daily sessions of care and learning through play for children aged two to four years old. Learner's children are cared for during lesson time while their parents or carers are on the premises in lessons.

**16.2** The onsite crèche has a separate safeguarding policy, that is reviewed annually. All safeguarding concerns are reported to the ONLS DSL and recorded centrally. All concerns regarding harm or possible harm to children are reported to the Newham MASH. Concerns raised in the crèche are addressed in the half termly safeguarding meetings as well as the crèche's own safeguarding meetings. In addition to complying with the Early Years Foundation Stage (EYFS) Framework 2021 safeguarding and welfare legislation, the crèche adheres to the requirements under the EYFS to "promote the good health of children".

**16.3** All crèche staff receive training on the crèche safeguarding policy and procedures so they have up to date knowledge of safeguarding issues. Safeguarding training enables staff to identify signs of possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way.

**16.4** Each crèche has a crèche manager who is trained to Level 3: Early Years Educator, NCFE Cache. All crèche staff are trained in Level 2: Early Years Educator, NCFE Cache.

## **17. Educational Visits, Trips, and events**

**17.1** Staff who are organising planned educational visits, trips or events off site should ensure a detailed risk assessment has been completed and passed onto the relevant Curriculum Manager 5 working days prior to the event or visit. The completed risk assessment must be overseen and approved by the line manager of the staff member organising the event/external visit. Risk assessments are checked by a safeguarding officer and stored centrally in the secure safeguarding folder online.

**17.2** Planned events taking place onsite should have a detailed risk assessment that is completed in partnership with the event organiser, Operational Facilities lead, Head of

Curriculum and the DSL. The completed risk assessment should be approved by the DSL prior to the event taking place.

**17.3** All parties involved in the risk assessment process should recognise that it serves not only to mitigate or eliminate potential risks but also as a prompt to explore alternative working methods and implement heightened controls or support, as necessary.

## **18. Use of External Agencies and Speakers**

**18.1** ONLS will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to learners are consistent with the ethos of the Service and do not marginalise any communities, groups, or individuals.
- Messages will not seek to glorify criminal activity or violent extremism or seek to radicalise learners through extreme or narrow views of faith, religion or culture or other ideologies.
- Learner activities are matched to the needs of learners and the course.
- Activities are carefully evaluated by services to ensure that they are effective and appropriate
- We recognise, however, that our ethos is to encourage learners to understand opposing views and ideologies. We actively engage learners in informed debate, and we may use external agencies or speakers to facilitate and support this.
- A manager or tutor will always accompany any visitor or guest speaker who is invited into the service.

## **19. Use of ONLS premises for non- ONLS activities**

**19.1** ONLS shares the building with other services and organisation. Some of these activities undertaken or facilitated at ONLS centres involve children or adults at risk of abuse, often bringing them into contact with our staff, volunteers, other service users, members of the public, contractors, and partner organisations.

**19.2** Where an allegation is made against the group or an individual from this group ONLS will follow its own safeguarding policies and procedures and inform the local authority designated officer (LADO) where relevant.

**19.3** All building user agreements include safeguarding requirements as part of the agreement, and as a condition of use and occupation of premises. The building user agreements are maintained and monitored by the Operations Lead who is a safeguarding officer. Failure to comply with this will lead to termination of the agreement. Room hires are managed by the operational lead.

**19.4** The building users operate under their own safeguarding policies and procedures

which have been made available to ONLS. External organisations who provide services or activities on ONLS premises are expected to submit details of their safeguarding procedures whilst on site, to the DSL. including a policy and records of DBS checks.

## **20. Professional Conduct**

**20.1** Staff need to be aware that their digital presence acts like an online footprint that other people, including learners and ex-learners, can have access to. Staff should take steps to make sure personal accounts are private and ensure learners cannot find and share their posts on social media. Staff must not use their personal social media accounts; this includes WhatsApp to have contact with current learners or learners who have left in the past 5 years. Communication with learners should only be via London Borough of Newham applications and devices.

**20.2 Unauthorised contact with learners**– Staff should not engage in secret or unauthorised contact with learners. Any contact outside of normal teaching or support activities must always be approved and recorded by the relevant line manager. In cases where a learner is distressed, staff should consider how they comfort the learner and avoid physical contact.

**20.3 Communication** – Staff should not send birthday or faith cards to learners. Staff must not give a personal email address, home telephone number, mobile number (unless a work mobile) or become friends on any social media.

**20.4 Lifts**- Do not take or receive lifts in a vehicle from a learner, young person, or vulnerable adult no matter how short the journey.

**20.5 Gifts** – Staff should be aware of the Service’s policy on receiving gifts form learners and should ensure that any gift given to learners are only a part of a recognised rewards system.

**20.6 Infatuation** – Any suggestion of a learner being infatuated with a member of staff should always be recorded and reported to their line manager.

**20.7 Lone Working** – Staff have a lone working risk assessment in place. Staff are to use it to mitigate the risk of lone working. Panic buttons are installed in offices and staff who are lobe workers are trained on their use.

## **21. All staff procedures for reporting a disclosure or safeguarding concern**

Complete an initial concern form and where relevant a witness statement form. Email the form to [onls.safeguarding@newham.gov.uk](mailto:onls.safeguarding@newham.gov.uk)

Prevent concerns are safeguarding issues and follow the same reporting procedure



above.

Urgent Concerns: speak directly to the DSL or a safeguarding officer.

**IMPORTANT – If a child or adult is at risk of abuse or imminent risk of harm or injury or has suffered harm or injury, call the Police by dialing 999 immediately.**

**All staff to inform the DSL when a 999 call is made.**

**All accidents and emergencies are to be recorded by on the Accident and Emergency form on Fusion.**

**21.1** It is not the responsibility of staff to decide whether a child or adult at risk of abuse is being abused or might be abused. However, there is a responsibility to act on concerns to protect children, young people, and adults at risk of abuse in order that appropriate agencies can then make enquiries and take any necessary action to protect the child, young person, or adult at risk of abuse. Any suspicion, allegation or disclosure must be reported as soon as possible on the day of the occurrence. All staff are expected to comply with safeguarding procedures. Noncompliance will be managed via line managers and the disciplinary procedure.

**21.2** Staff should remain calm and reassured throughout any discussions with a learner who is disclosing abuse, suspected abuse or issues which may (or may not) be below the threshold of the definition of abuse. Learners (or anyone making the disclosure) should always be reassured and believed. The disclosure should always be reported via the ONLS reporting system, and if advice is required, discuss it with a member of the Safeguarding team.

**21.3** Under no circumstances should staff promise confidentiality to a learner who is disclosing abuse or suspected abuse. Under no circumstances should staff make decisions whether the disclosure is under the threshold of referral but should always refer to the safeguarding team. The staff member should explain that if what the learner wishes to say or has said relates to the learner's own safety or that of another person, then the staff member will have to inform the Designated Safeguarding Officer.

**21.4** When managing a disclosure, the following communication and recording method should be followed:

- Listen carefully
- Record the conversation in the person's words (handwritten notes)
- Take note of the time, sign, and date the records
- Take all allegations or disclosures seriously (never judge)
- Reassure the individual that they are right to disclose
- Explain what will happen next e.g., safeguarding referral is being made.

**Finish by asking the learner:**

- is there anything else you wish to tell me?

**21.5** When managing a disclosure from an adult, there should be a focus on making safeguarding personal, which means it should be person-led and outcome-focused. It should engage the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing, and safety.” For example, following a disclosure ask “what do you want to happen? What outcome do you want? There should be a person-centred approach which means that adults are encouraged to make their own decisions and are provided with support and information to empower them to do so. This approach recognises that adults have a general right to independence, choice and self-determination including control over information about themselves. Staff should strive to deliver effective safeguarding consistently with the principles above. They should ensure that the adult has accessible information so that the adult can make informed choices about safeguarding: what it means, risks, benefits, and consequences. Staff will need to clearly define the various options to help support them in making decisions about their safety.

**21.6** In managing a disclosure, staff must not:

- Ignore any safeguarding allegation or disclosure
- Ask leading or prompting questions
- Make promises they are not able to keep in confidence
- Jump to any immediate conclusions
- Speculate or accuse anyone
- Discuss concerns with a parent, carer, guardian, or family member in the first instance.
- Keep any allegations confidential (every safeguarding concern must be shared formally with the safeguarding team).

*See Appendix 1 for the Initial Concern Form*

*See Appendix 2 for the Confidential Witness Statement Form*

### **21.7 Dealing with Confidentiality**

**21.8** Information sharing is vital in identifying and tackling all forms of abuse and neglect. The Data Protection Act 2018 and GDPR (General Data Protection Regulations) do not prevent the sharing of information for the purposes of keeping ONLS safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of all.

**21.9** However, information about safeguarding should only be shared on a need-to-know basis, as advised by the safeguarding team and/or external agencies. Any personal and sensitive data should be processed in accordance with the terms of Data Protection legislation as amended by GDPR and as interpreted in the ONLS’s data management, storage, retention, and related statements.

**21.10** Adults have a general right to independence, choice and self-determination including control over information about themselves. In the context of adult safeguarding these rights can be overridden in certain circumstances. Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent. The law does not prevent the sharing of sensitive, personal information within organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified. The law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented. Information can be shared lawfully within the parameters of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

### **21.11 DSL procedures for managing a reported disclosure or safeguarding concern**

The DSL will log the concern and record a concern identification number. The concern will be managed by the DSL or assigned to a Safeguarding Officer who will be responsible for investigating and making enquiries about the concern. A decision reached as to whether the concern can be managed with an internal safeguarding plan or referred to external agencies or the Police.

### **21.12 Recording actions under each reported concern**

All initial concern forms are securely stored in a restricted and protected folder on the ONLS DSL confidential folder. A record of all actions and decisions must be made as record keeping is a vital component of professional practice. As a minimum there should be an audit trail of:

- Date and circumstances of concerns and subsequent actions
- Decision making process and rationales
- Risk assessment and risk management plans
- Consultations and correspondence with key people
- Advocacy and support arrangements
- Safeguarding plans
- Outcomes
- Feedback from adult and their support network
- Differences of professional opinion
- Referrals to professional bodies
- Status of the case, open, closed, or monitored.

**21.13** The keeping of accurate records provides an opportunity to learn and any matters arising from the case could lead to the improvement of ONLS's procedures and/or policies. It also provides guidance for the training needs of staff. The insights from case

notes are evident not just in cases which are concluded and found to be substantiated, but also those unsubstantiated.

## **22. Dealing with Allegations of Abuse: Against Members of Staff**

**22.1** Where an allegation is made about the conduct of a member of staff in their personal or private life this should be reported directly to the Head of Service. Human Resources will manage the investigation in line with the Safeguarding Adults National Guidance and Newham's PiPoT process.

### [Allegations against People in Positions of Trust – Safeguarding and prevention – Newham Council](#)

Where such concerns are raised about someone who works with adults with care and support needs, it will be necessary for the employer to assess any potential risk to adults with care and support needs who use their services, and, if necessary, to take action to safeguard those adults.

Examples of such concerns could include allegations that relate to a person who works with adults with care and support needs who has:

- behaved in a way that has harmed, or may have harmed an adult or child
- possibly committed a criminal offence against, or related to, an adult or child
- behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs

**22.2** Where an allegation is made about the DSL this should be reported directly to the Head of Service. Where an allegation is made about the Head of Service this should be reported directly to the Chair of the Advisory board.

**22.3** The appropriate senior manager/DSL will take the steps necessary to ensure the safety of the child/adult in question and any other person who is considered at risk.

**22.4** All staff should be signposted to the Employee Assistance Programme following any reported allegation against them. It may be a necessary part of a safeguarding enquiry to put information to the person allegedly responsible, where it has not been possible to obtain consent to this. Providing information on the nature and outcomes of concerns to people alleged to have caused harm also needs to be seen in the wider context of prevention; for example, information can be used to support people to change or modify their behaviour. The person/organisation that is alleged to be responsible for abuse and/or neglect should be provided with sufficient information to enable them to understand what it is that they are alleged to have done or threatened to do that is wrong and to allow their view to be heard and considered. Whilst the safety of the adult remains paramount the right of reply should be offered where it is safe to do so.

## **23. Managing allegations without foundation**

The Designated Safeguarding Lead and/or the designated Advisor, the Director/Head of Service should:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
- Inform the learner/carer of the alleged victim that the allegation has been made and of the outcome.;

## **24 External Enquiries & Investigations**

**24.1** Child protection enquiries by the relevant local authority Duty and Referral Team or the Police are not to be confused with internal disciplinary enquiries by ONLS. ONLS may be able to use the outcome of external agency enquiries as part of its own procedures.

**24.2** ONLS should seek advice from the relevant external agency as to whether to hold in abeyance its own internal enquiries while any Duty & Referral Team, LADO and/or Police investigation proceeds; to do otherwise may prejudice the investigation. Any subsequent internal enquiries should conform to existing staff disciplinary procedures.

**24.3** If there is an investigation by the Police, the DSL should normally be involved and contribute to the inter-agency strategy discussions. The DSL is responsible for ensuring that ONLS gives every assistance to the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries in the interests of the member of staff about whom the allegation is made. The DSL shall advise the member of staff that s/he should consult with a representative, for example, a trade union.

**24.4** Media attention during an investigation of an allegation can add to the problems for the members of staff and may even hinder enquiries. ONLS should manage all media relations sensitively and appropriately. Any briefings for staff should emphasize the need to avoid media coverage. Staff have some protection under the Human Rights Act 2000 with its commitment to protect "privacy".

## **25. Reporting to External Agencies – the ESFA, the LADO (children) Or PiPoT Lead (adults)**

**25.1** Where ONLS or one of its partners or subcontractors, is subject to an enquiry by the local authority or the Police, the Chair of Advisors, Head of Service or DSL will inform the LADO (Local Authority Designated Officer) or PiPoT Lead,

Email the ESFA (Education and Skills Funding Agency). In this instance, the ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be, investigated by the local authority and/or the Police.

**25.2** Partners or subcontractors will be made aware and need to notify ONLS of all staff incidents or serious safeguarding concerns. ONLS will follow their own safeguarding procedures alongside the partners or subcontractors own.

## **26. Record Keeping**

**26.1** It is important that all documents relating to an enquiry are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential HR file. All information obtained whilst implementing any part of this procedure will be kept strictly confidential and in accordance with Data Protection legislation on the understanding that should the Police or any other statutory body be involved then such records may need to be disclosed by law.

If a member of staff resigns before the disciplinary process is completed, they will be informed about ONLS's statutory duty to inform the Secretary of State for Education under the Vetting & Barring Scheme.

## **27. Whistleblowing**

**27.1** All staff should feel able to raise concerns about poor or unsafe practice at ONLS. The LB Newham Whistleblowing policy is located on the ONLS website. Any concerns about how an actual or potential safeguarding case is being managed should be raised with the DSL in the first instance. If the person raising the concern is not satisfied with the response, they should raise the matter with the Head of Service.

**27.2** London Borough of Newham has a Whistleblowing Policy which can be consulted. The policy and the NSPCC has a Whistleblowing Advice Line which offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation. Staff can call 0808 800 5000 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **28.Safeguarding team**

### **Designated Safeguarding Lead: Bunmi Otubushin**

The Designated Safeguarding Lead is supported by a team of 6 safeguarding officers.

Jaspal Dhaliwal	Head of Service
Roxana Jobson	Head of Curriculum
Laura Iacsa	ESOL Curriculum Manager
Denise Herman	PCFL Curriculum Manager
Abdul Hasib	Operational Lead
Maysie Brown	Inclusive Learning Manager

Posters promoting the Safeguarding Officers can be found in all classrooms, every toilet block and on most notice boards across the service.

## 29. Key Safeguarding contacts

External Agency	Contact
Police and emergency services	999
Police: non-emergency	101
Medical: non-emergency	111
<b>Newham Council Adult MASH Team (24hrs)</b> During office hours (Monday to Friday - 9am to 5pm), please select option 1 where your call will be handled by a member of the Access Team. Calls made outside of these hours will be picked up by Newham Telecare.	020 3373 0440
<b>Newham Council Children and Young People MASH Team</b> If your referral requires urgent attention, please contact Newham Contact Centre who will transfer you to the social work duty team.	0208 430 2000
<b>Newham Council Children and Young People MASH Team</b> If you are a parent/carer or a member of the public and want to make a referral or make an anonymous request.	0203 373 4600

Local Agencies	Contact
Newham-PREVENT Leads: Ghaffar Hussain and Mike Shoemith	community.resilienceteam@newham.gov.uk
Newham PREVENT referral form	<a href="#">PREVENT Referral - Details of the individual being referred - Section 1 - Newham Online Forms (achieveservice.com)</a>
Prevent advice line	0800 011 3764
The anti-terror hotline	0800 789 321
Crimestoppers anonymously	0800 555 111
Newham-DOMESTIC ABUSE	0808 196 1482 InfoNewhamDSV@hestia.org
Newham Mental Health Crisis Line/Crisis Support	0800 073 0066
Newham LADO	0203 3733803 / 0203 3736706
Newham LADO Nick Pratt or Alex Mihu	lado@newham.gov.uk
Newham LADO referral form	<a href="#">LADO-referral-form-2020.pdf (newhamscp.org.uk)</a>
Newham PiPoT	PiPoT@Newham.gov.uk

**Policies that work alongside the Safeguarding and Prevent policy:**

- Children's Act 1989 and 2004
- The Care Act 2014
- The Female Genital Mutilation Act 2003
- The Domestic Abuse Act 2021
- The Forced Marriage Act 2007
- The Counter Terrorism and Security Act 2015
- Working Together to Safeguard Children 2018
- Data Protection Act 1998 and General Data Protection Regulation 2018
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Safeguarding Children & Safer Recruitment in Education DCSF 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- The Children and Families Act 2014
- The Modern-Day Slavery Act 2015
- Prevent Duty Guidance for Further Education Institutions in England and Wales
- The Human Rights Act 1998
- Children & Young Persons Act 2008 2016
- Vetting and Barring Guidance (ISA) – July 2016
- Children Missing Education September 2016
- Working Together to Safeguard Children February 2018
- Sexual Violence and Sexual Harassment between Children in School and Colleges 2018
- Early Years Foundation Stage (EYFS) Framework 2021
- Keeping Children Safe in Education (KCSiE) September 2023
- LBN Recruitment and Selection Policy (for Safer Recruitment)
- Mental Capacity Act 2005
- LB Newham Whistle Blowing Policy 2011
- London Multi Agency Adult Safeguarding Policy and Procedures 2019
- ONLS Crèche Safeguarding Policy
- ONLS Acceptable Use Policy (for IT use)
- ONLS Learner Agreement
- ONLS Staff Disciplinary Policies
- ONLS Staff Code of Conduct





## CONFIDENTIAL Initial Concern Form

*Note: This form should be completed by the member of staff who is reporting a safeguarding concern or by a Safeguarding Officer. It should be as detailed as possible.*

*Email completed form to: [onls.safeguarding@newham.go.uk](mailto:onls.safeguarding@newham.go.uk)*

<b>Name of member of staff making referral:</b>	<b>Concern Date/time:</b>
<b>Learner Name:</b>	<b>DOB:</b>
<b>Learner ID Number:</b>	
<b>Centre:</b>	
<b>Parent/Carer:</b>	
<b>Associated people:</b>	
<b>Context e.g., Lesson on...</b>	
<b>Nature of concern. Physical neglect, financial abuse, harassment, domestic abuse, incitement to violent extremism, etc.)</b>	
<b>Is this concern urgent?</b> <b>If yes report directly in person to the DSL or a safeguarding officer.</b>	
<b>Detail of concern:</b>	
<b>Action taken:</b> <i>(E.g. Passed on to member of Safeguarding Team)</i>	

**Attachments (statements, documents)**

Appendix 2



## CONFIDENTIAL Witness Statement

<b>Name of person making statement:</b>	
<b>Name of person requesting statement:</b>	
<b>Location:</b>	
Other people the witness saw at the scene while the witness was there? Describe if names are unknown.	
Describe what you saw, heard, smelled, during the incident:	

Did you note anything unusual prior to or during the incident? If yes, please describe what you noted and why the witness thinks it was unusual.

Signed	Date
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*Email completed form to: [onls.safeguarding@newham.gov.uk](mailto:onls.safeguarding@newham.gov.uk)*

## Appendix 3

### Definitions and Terms

**Abuse:** A form of maltreatment of a child/young adult. Somebody may abuse or neglect a child or adult at risk of abuse, by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.

**Physical Abuse:** A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child/young adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Sexual Abuse:** Involves forcing or enticing a child/ vulnerable young adult to take part in sexual activities including forcing someone to watch porn, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see peer-on-peer abuse and modern slavery).

**Sexual Violence and Sexual Harassment:** Sexual violence and sexual harassment may occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing, and in all likelihood, it will adversely affect their educational attainment. The ONLS takes all victims seriously and they will be offered appropriate support. Our ONLS states that sexual violence and sexual harassment is not acceptable in any circumstances. Our ONLS will manage such incidents in the same way as all safeguarding and/or criminal acts and will follow the Sexual Violence and Sexual Harassment between children in schools and colleges guidance (Department for Education 2018).

**Neglect:** The persistent failure to meet a child's/ vulnerable young adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's/ vulnerable young adult's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child/ vulnerable young adult from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or irresponsiveness to, a child's/ vulnerable young adult's basic emotional needs.

**Domestic Abuse:** The definition of Domestic Abuse is any incident or pattern or incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who have, or have been, intimate partners of family members regardless of gender or sexuality. The abuse can encompass but not limited to psychological, physical, sexual, financial, and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

**Child Criminal Exploitation (CCE):** CCE is where an individual or group take advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity, such as (a) in exchange for something the victim wants or needs, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through verbal coercion or the use of technology. CCE can involve children being used to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, financial abuse or to threaten another young people. County lines is a term used to describe gangs and organised crime networks involved in exporting illegal drugs into one or more areas of the country using dedicated mobile phones or other form of "deal line". Exploitation is an integral part of the county lines model with children and vulnerable adults exploited to move (and store) drugs and money.

**Child Sexual Exploitation (CSE):** Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur with technology. CSE can

affect any child or young person under the age of 18 years, including 16- and 17-year-olds, who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge e.g., through others copying videos or images they have created and posted on social media, nudes, or semi-nudes.

**'Honour-Based' Abuse (HBA):** So-called "honour-based abuse" encompasses crimes which have been committed to protect or defend the honour of the family and/or the community', including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of HBA are abuse (regardless of motivation) and should be handled and escalated as such.

**Forced Marriage:** The difference between a forced marriage and an arranged marriage is important to understand. The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a 'forced' and an 'arranged' marriage. In arranged marriages, the families of both spouses may take a leading role in choosing the marriage partner, but the choice of whether to accept the arrangement remains with the young people. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. Forced marriage is illegal and there are clear Government and legal guidelines on what to do if this is suspected. If a student suddenly leaves ONLS or indicates unhappiness at a planned marriage, this must be reported immediately. All such cases must be urgently referred to the Designated Safeguarding Lead (DSL) or Campus Safeguarding Leads. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.'

**Female Genital Mutilation (FGM):** Female genital mutilation 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. FGM typically takes place between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8. Victims of FGM are likely to come from a community that is known to practise FGM. Staff 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.

Any staff member who receives a disclosure from a student that they have been the subject of FGM now has a duty to report the matter to the Police directly. The member of staff must first inform the DSL or Campus safeguarding Lead and the police should be contacted.

**Prevent, Radicalisation and Extremism:** The Prevent Strategy was launched by the Government in 2007 and seeks to stop people becoming terrorists or supporting terrorism. It is also aimed at those in danger of being radicalised either from a religious or political perspective. It is the preventative strand of the Government's counter-terrorism strategy, CONTEST.

**Channel:** Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

**Sexting:** Sexting is an increasingly common activity, where people share inappropriate or explicit images online. This can include sharing indecent images of themselves or others via mobile phones, webcams, social media, and instant messaging. Although viewed by many young people as 'normal' and part of 'flirting' or showing confidence through their 'selfies', 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 permission. There is an increased risk of blackmail, bullying, emotional distress, and unwanted attention.