

# Safeguarding, Child Protection & Prevent Policy

**Responsible for Implementation: Chief Operating Officer**

**Latest Review Date: August 2023**

**Next Review Date: August 2024**

**Authorised By: Chief Operating Officer**

**Version 1**

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## Contents:

1. Safeguarding, Child Protection, Prevent and Online Safety Policy Statement
2. Management of Safeguarding and Prevent
3. Scope and Definitions
  - 3.1 Safeguarding
  - 3.2 Child Protection
  - 3.3 Prevent and the Channel referral process
  - 3.4 Extremism
  - 3.5 Core British Values
  - 3.6 Abuse and Neglect (defined by the Department of Health)
  - 3.7 Female Genital Mutilation (FGM)
  - 3.8 Types and Indicators of abuse and neglect - learners aged up to 18 and learners aged 18+
  - 3.9 Sexual abuse and sexual harassment
  - 3.10 Mental health
  - 3.11 Childhood abuse and domestic abuse and neglect
4. Online Safety
  - 4.1 We recognise that
  - 4.2 How we seek to keep people safe from online harm
  - 4.3 If online abuse occurs, we will respond to it by
  - 4.4 Responding to cases linked to sexting, sexual abuse and sexual exploitation
  - 4.5 Legal Framework for online safety
5. Allegations against staff, including supply staff, volunteers & contractors
6. Related policies and procedures
7. Appendices
  - 7.1 Online safety - Relevant Acts and legislation
  - 7.2 Online safety - Other sources of guidance
  - 7.3 Operating and staff guidance general advice
  - 7.4 Reporting & analysis of data

7.5 Staff Recruitment & Training

7.6 Data Protection & UK GDPR

7.7 Radicalisation - Vulnerability/risk indicators 7.8 Modern Slavery & Human Trafficking

7.9 Relevant Legislation

7.10 Useful Support Contacts

## About Us

Access Further Education Ltd ('The College') has subsidiary companies, trading names and trading partnerships through which it operates. The trading names and partnerships might have their own names or brands, but the legal entity for the purpose of this policy is Access Further Education Ltd. Trading subsidiaries, trading names and trading partnerships include Access Creative College ('ACC'), National College for Creative Industries ('NCCI') and Access Sport. The dBs Institute (DBS Music UK Holdings and its subsidiaries), whilst a separate legal entity, shares common Directorships with the College, however, responsibility for Student Services & Safeguarding related policies within dBs falls to the Head of Support, Safeguarding & Student Services of Access Further Education Ltd.

## 1. Safeguarding, Child Protection, Prevent and Online Safety policy statement

The College has an ethical and statutory obligation towards the safety, welfare and wellbeing of its staff and students. For the purposes of this policy, the word 'student' covers all those engaged in learning within the College including centre based learners, apprentices and trainees.

The College believes that the welfare of the individual is paramount and recognises its duty and responsibility to protect when there is a cause for concern.

The College recognises the continuing rise in mental health issues for young people, particularly anxiety, since the start of the Covid-19 pandemic. The College is committed to the early identification of resulting safeguarding concerns and the provision of support both internally and externally.

Although the two terms, 'Safeguarding' and 'Child Protection' are not synonymous, they are often used interchangeably. However, Safeguarding is what we do for all learners, whilst Child Protection refers to those young people aged 17 or under who are affected by, or at risk of, significant harm. The College will also ensure that appropriate and complementary systems relating to Adults i.e. those aged 18 or over are also in place.

The College also recognises its duties under section 26 (10) of the Counter terrorism and Security Act 2015) and the requirements to prevent people from being drawn into terrorism. Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy.

The Prevent Strategy states 'Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm'. It aims to stop people becoming terrorists or supporting terrorism. In the same way that support is provided to people at risk of involvement with drugs, gangs, or other forms of harm, individuals vulnerable to being groomed into radicalisation can also be helped.

Prevent is an integral part of safeguarding and the College's Prevent Duty Risk Assessment and action plan support this policy and aim to ensure a safe, tolerant and respectful community. Guidance information also

ensures the CHANNEL referral process is clear for all DSLs to follow if required.

All staff and students have the right to:

- Live and work in a safe environment and be protected from harm;
- Experience emotional well-being;
- Feel valued and be supported by a network of professional relationships;
- Have a positive self-image;
- Have a secure sense of cultural, social and racial identity;
- Develop good interpersonal skills and confidence in social situations.

**The College believes:**

- In demonstrating our full commitment to the significance of the Equality Act 2010 within our safeguarding practices and the College will not unlawfully discriminate against learners because of their protected characteristics:
- That all staff and students without exception have the right to protection from abuse regardless of gender, ethnicity, disability, age, sexuality or beliefs and the right to challenge and protection from extremist behaviour, ideologies or those who promote them. Any allegations of abuse including attempts to radicalise learners will be taken seriously and responded to appropriately.

The College is also committed to supporting and ensuring that measures to end the abuse and degrading treatment of individuals and groups through modern slavery and human trafficking are in place and do not form part of the conduct of business by the College, its partners or supply chain.

The College is committed to online safety for staff and students and will adopt practices to:

- Ensure the safety and wellbeing of young people and adults is paramount when they are using the internet, social media or mobile devices.
- Provide staff and volunteers with the overarching principles that guide our approach to online safety
- Ensure that, as an organisation, we operate in line with our values and within the law in terms of how we and our learners use online devices

The College is committed to the principle of safe recruitment, selection and vetting of all staff.

## 2. Management of Safeguarding, Child Protection, Prevent & Online Safety

A member of the board of Access Creative College has responsibility for governance of Safeguarding, child protection, Prevent and Online Safety. The Chief Operating Officer is the chair of the Safeguarding and Prevent Committee which meets at least half termly. The membership of the committee includes the designated board member, the Head of People Systems, the Head of Support, Student Services and Safeguarding and senior members of staff from the college and partner organisations.

The board is fully committed to ensuring that:

- The Safeguarding, Child Protection, Prevent and Online Safety Policy meets statutory requirements and contains up-to-date information and references;
- The Prevent Duty Risk Assessment is up to date and progress against actions is monitored;
- The Safeguarding and Child Protection and Prevent procedures guidance clearly sets out what staff should do if they have a concern about a learner;
- The most up-to-date Safeguarding, Child Protection and Prevent Policy is available on the website
- The board has oversight of Online safety systems used throughout the college.

The work of the College Designated Safeguarding Leads (DSLs) is supported through access to appropriate external agencies and support services. This includes the links established with the DfE Regional Prevent Coordinators and their local knowledge which informs updates of each centre's Prevent Duty Risk Assessment.

The DSLs and/or the Board will invite professionals from other agencies to advise The College on its policy and practice as well as inform the group on current developments.

Regular reports with regard to Safeguarding and Prevent protection matters and incidents are regularly presented to ELT and also the ACC Board.

The Board will receive and review recommendations submitted and determine/approve any amendments to policies and procedures. The Board will also note the outcomes of any serious case reviews or reports from external bodies in determining appropriate arrangements to be implemented.

Every organisation has by law to nominate a senior member (or several senior members) of staff to advise and guide on issues relating to allegations of, or suspected abuse. These persons are trained in related legislation and procedure and should be contacted as a matter of urgency as soon as a case presents itself. Every College centre has a Learner Support Manager (LSM) who is a DSL in addition to all Heads of Centre and managers within apprenticeship provision. Larger centres have pastoral and support staff and additional DSLs to support the LSM. Partners of the College will also have DSLs who link with the Head of Support, Student Services and Safeguarding.

The College's centres and partners link to two National Designated Safeguarding Leads (NDSLs) in the Central Management team of the College who oversee the national safeguarding and Prevent picture and implementation of this policy and practice at local level.

The Designated Safeguarding Lead, either nationally or at centre level as appropriate, will also coordinate arrangements for onward referrals to relevant external agencies including:

- Local Authority Safeguarding bodies, services covering both Children and Vulnerable Adults, Regional FE/HE PREVENT Coordinators, Police PREVENT Officers, Health Commissioning groups and other stakeholders.
- National DSLs will also liaise with partners and sub-contractors in conjunction with relevant link managers to ensure that appropriate notifications and escalation routes are maintained in line with relevant partner and sub-contract arrangements.

There are multi-agency working arrangements in place on a local level. The safeguarding partners are the local authority, a clinical commissioning group for an area within the local authority and the chief officer of police for an area. These three partners make arrangements for providers locally to be fully engaged, involved and included in safeguarding arrangements and the college has a statutory duty to cooperate with the

published arrangements.

It is important that all issues are handled with sensitivity and respect. All individuals have the right to make important decisions about their own lives.

### **Managing of Safeguarding, Prevent and Online Safety for apprentices**

The Head of Apprenticeships is the DSL who links with the National DSLs in the same way as centre safeguarding teams, to provide regular oversight of any cases. A shared commitment to safeguarding is secured from all employers and the 'Employer guide to apprentices' clearly articulates their role and responsibilities in the management of cases.

All employers are made aware of their DSL and the requirement to act promptly in linking with the Industry Practitioner (IP) in the first instance in response to any potential safeguarding or Prevent issue. Within the apprenticeship team, DSLs link with the relevant IP to ensure that appropriate support is put in place for the apprentice and that the employer is updated as necessary to promote the apprentice's wellbeing.

## **3. Scope and definitions**

This policy statement applies to all staff, volunteers, young people and anyone involved in the College's activity, including in:

- The provision of learning programmes, including T Levels, for students aged 16+ both in our centres and in work placements
- The provision of apprenticeships
- The provision of traineeships

The Covid-19 pandemic led to increased mental health problems for young people and overwhelming demand for external specialist support services. The College is committed to supporting learners until referrals for specialist support are successful.

### **3.1 Safeguarding**

Safeguarding is a term which encompasses more than 'child protection' as it also includes the concept of prevention and the active promotion of wellbeing. It reflects, therefore, a climate of being prepared, rather than reacting to a situation or event after it has taken place. Both mental and physical health or development are relevant to safeguarding and the welfare of children and young people.

The Children Act 1989 defines a child as "a person under the age of 18". This could therefore include: ○ Any student up to the age of 18;

○ Any other person under the age of 18 who becomes known to The College, including visitors and staff.

Where reference is made within this policy, to children and young people, this term is used to mean those under the age of 18. Any concerns raised to a Local Authority will be raised to Children's Social Care. The term "adult at risk" is used within this policy in replacement of the term "vulnerable adult". An adult at risk is a person of 18 years of age or older 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 be unable to protect him or herself against significant harm or exploitation. An adult at risk may therefore be a learner who, for example:

- Is an older person who is frail due to ill health, physical disability or cognitive impairment;
- Has a learning disability
- Has a physical disability and/or a sensory impairment;
- Has mental health needs including dementia or a personality disorder;

- Has a long-term illness/condition
- Misuses substances or alcohol
- Is a carer such as a family member/friend who provides personal assistance and care to adults and who is subject to abuse
- Lacks the mental capacity to make particular decisions and is in need of care and support.

## 3.2 Child Protection

Child protection is those measures that are put into place once a learner, aged under 18, has been identified as at risk of or has suffered significant harm, with the objective of protecting that individual from further risk or actual harm.

## 3.3 Prevent and the Channel referral process

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. The College fulfils its statutory responsibilities by ensuring that all staff recognise that protecting young people from extremism and radicalisation is a key plank 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.

The College ensures that learners are taught 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 young people.

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 investigations where concerns are raised around 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 multi agency 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.

This system, the CHANNEL process, is utilised by the College to provide learners with access to a confidential and voluntary process where support options can be offered.

## 3.4 Extremism

Extremism is defined in HM Government guidance as:

“Vocal or active opposition to fundamental British values....including calls for the death of members of our armed forces, whether at home or overseas.”

## 3.5 Core British Values also referred to as Fundamental British Values

British Values are defined as:

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

All College staff will receive training and support to ensure that they have sufficient knowledge of British Values, Prevent and radicalisation and exemplify British Values in their work and in their general behaviours.

The College's own values embody the British Value of 'mutual respect and tolerance' as they include commitments to being inclusive, fair to everyone and showing respect to one another.

### 3.6 Abuse and neglect (defined by the Department of Health)

Abuse and neglect is “...a violation of an individual’s human and civil rights by any other person or persons.” This definition is provided by the Department of Health.

The early identification of abuse and neglect is vital and all staff should be aware that safeguarding issues are rarely ‘stand alone’ events that can be covered by one definition or label. If staff are unsure they should always speak to a designated safeguarding lead.

All staff should be aware that safeguarding incidents and/or behaviours can occur between learners outside the learning environment and can be associated with external factors. These include factors outside the familial setting and learners can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Abuse and neglect is “...a violation of an individual’s human and civil rights by any other person or persons.” This definition is provided by the Department of Health.

The early identification of abuse and neglect is vital and all staff should be aware that safeguarding issues are rarely ‘stand alone’ events that can be covered by one definition or label. If staff are unsure they should always speak to a designated safeguarding lead.

### 3.7 Female genital mutilation (FGM)

All staff should speak to a DSL with regard to any concerns about female genital mutilation. There is however a specific legal duty on teachers regarding such cases. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### 3.8 Types and indicators of abuse and neglect

#### Learners aged up to 18

Abuse is a form of maltreatment of a child or young person or may constitute a single act or a series of repeated actions or by failing to prevent harm. Abuse may be in a family, institutional or community setting by those known to them or by others, including adults, young people or children.

KCSIE advocates the use by staff of ‘professional curiosity’ and reinforces that staff should speak to a DSL if they have concerns about a child. KCSIE 23 states ‘all staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened.’

Staff and learner relationships are discussed in KSCIE ‘It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.’ The College staff, not only those with a dedicated pastoral role, are committed to fostering positive relationships with learners to create safe learning environments and to build mutual trust and respect.



Abuse may take various forms and specific types of abuse are explored in more detail in the section which follows. The list is not exhaustive but indicative of the range of abuse that can be experienced and which is within the scope of safeguarding and Prevent:

- Physical abuse: Physical injury/violence, including bullying;
- Emotional abuse: the persistent emotional maltreatment of a child or young person including bullying via cyberbullying and harassment as well as exploitation and corruption;
- Sexual abuse: where an individual is forced to enter into a sexual act without their consent, or where they are unable to consent. Sexual abuse can take place online and technology can be used to facilitate offline abuse;
- Sexual violence and sexual harassment in college or in the community;
- Child on child abuse or violence - defined by Ofsted as:including, but not limited to:
  - Physical and sexual abuse
  - Sexual harassment and violence
  - Emotional harm
  - Online and offline bullying
  - Teenage relationship abuse
  - It can even include grooming children for sexual and criminal exploitation.
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where there is an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity;
- Risk of serious crime or serious violent crime (including 'county lines' activity)
- Hazing (challenges or humiliation resulting in psychological or physical abuse)
- Radicalisation and/or extremism behaviour;
- Financial abuse, where an individual is forced to part with money against their will, or money is systematically taken from them without their consent;
- Modern slavery;
- Neglect: the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of development. This includes the failure to act when action is needed;
- Upskirting: The Voyeurism (Offences) Act, which is commonly known as the Up skirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim;
- Online Abuse: this can be linked to emotional abuse, bullying or sexual abuse outlined above;
- Substance misuse;
- Racist, disability, homophobic or transphobic abuse;
- Honour based violence (including forced marriage); Since February 2023, marriage under the age of 18 is illegal.
- Issues that may be specific to a local area or population, for example gang activity and youth violence.

Any other issues not listed here but that pose a risk to children, young people and vulnerable adults. Abuse can be carried out by anyone, it may be related to an imbalance of power, be linked to personal or family relationships, cultural or religious background or child on child activities.

The college recognises that young LGBTQIA+ learners may be more at risk of abuse than others and aims to focus on prevention education for all learners to help prepare them for life in 'modern Britain'. The college recognises that these learners may have disproportionate vulnerabilities and is committed to a zero tolerance



culture of 'sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment'.

## Learners aged 18+

- Physical abuse: this includes assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Domestic violence and abuse:: this includes psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence and abuse..
- Sexual abuse: this includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- Psychological abuse: this includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- Financial or material abuse: this includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- Modern slavery: this encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- Discriminatory abuse: this includes forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- Organisational abuse: this includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- Neglect and acts of omission: this includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Self-neglect: this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

## 3.9 Sexual abuse and sexual harassment

The College has a zero tolerance policy on sexual harassment in whatever form including online and social media, such as 'sexting' and the sharing of unsolicited images. The College actively works to minimise the risk of child on child 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'. The College is committed to countering any culture of unacceptable behaviours and an unsafe environment to learners.

The College is committed to supporting learners who experience any form of sexual abuse including online abuse. All staff are sensitive to the needs of victims and respect their right to be taken seriously. In line with KCSIE victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment'. The focus is to ensure that students understand that the law on child on child abuse is there to protect them rather than criminalise them. In line with KCSIE, the college recognises the importance of explaining to learners that 'the law is in place to protect them rather than to criminalise them'.

The College recognises the importance of 'intra-familial harms, and any necessary support for siblings following incidents' (KCSIE 2023, along with the need to be a part of discussions with statutory safeguarding partners. As part of our safeguarding duties, the College ensures that learners are made aware that some forms of online activity such as consensual sharing of images and videos are not 'abusive' but are in fact illegal. This is done through a variety of means including regular inputs in Progress Reviews and the use of posters, such as the learner-facing Online safety poster. .

The College recognises that teaching young people about safeguarding issues can prevent harm by providing them with the skills, attributes and knowledge they need to identify risks, including those encountered online and to access help when they need it. In no circumstances is it ever acceptable for abuse to be passed off as 'just banter' or 'just having a laugh'. The College is committed to countering any culture of unacceptable behaviours and an unsafe environment to learners.

Risks of child on child abuse are minimised by ensuring that all members of staff are alert to any signs of it and are confident in challenging unacceptable behaviour immediately and following the college's processes. In line with KCSIE, both victim and perpetrator and any others involved including parents/carers are well supported.

In the case of online abuse, the advice of the UK Council for Internet Safety (UKCIS 2020) is followed by safeguarding teams in ACC in supporting learners from the risks and in managing incidents.

The College follows specific government guidance on responding to incidents and safeguarding of children and young people. These include our awareness of the requirement for children to have an Appropriate Adult present where needed. . Further information can be found in the Statutory guidance (.PACE Code C 2019).

### 3.10 Mental health

All staff should be aware that mental health problems can be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

We recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are however well placed to observe learners' behaviour and identify those who may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken using the College's reporting procedures which include routes to escalate and clear referral systems.

### 3.11 Childhood and domestic abuse and neglect

Where children and young adults have suffered abuse and neglect, or other potentially traumatic adverse experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

It should be noted that children and young people can also be adversely affected by witnessing 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.

Since KCSIE 21, domestic abuse has been added to the list of safeguarding issues that all staff should be aware of. The guidance makes it clear that domestic abuse can:

- be psychological, physical, sexual, financial, or emotional
- impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

There is also a reminder to all staff in KCSiE that ‘children may not feel ready or may not know how to tell someone they are being abused/neglected. They also might not be able to identify their experiences are harmful’. Fostering good relationships with learners built on trust and respect will help the College staff to recognise signs that there may be underlying problems and to offer sensitive support when the learner feels ready to share any concerns.

The college is supporting its safeguarding staff to undertake training offered by Operation Encompass. Operation Encompass is now in place across the country and is supported by the policy (HMICFRS) and Ofsted and is also endorsed by the Home Office. Operation Encompass is a police and education early information safeguarding partnership, enabling schools and colleges to offer immediate support to children experiencing domestic abuse. A notification is made to the DSL within a day of police attending an incident of domestic abuse where there are children related to either of the adult parties involved,

Experiencing domestic abuse has been defined as an ‘Adverse Childhood Experience’ and the College recognises the impact of domestic abuse upon social, psychological, physical, emotional and behavioural outcomes. These often impact negatively upon a child’s academic success. Early access to appropriate support, depending on the wishes of the child, can help to reduce the more damaging effects of some impacts and to help the child to achieve the best future academic outcomes.

## 4. Online safety

We believe that young people should never experience online abuse of any kind.

They should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times.

The protection of learners from online abuse is vital and there is an ongoing increased focus within the College to equip students with the skills to be confident in Online Safety and to know how to report issues.

The College is committed to developing a whole organisation approach to online safety which effectively empowers it to protect learners and staff in their use of technology.

The potential impact of online abuse is assessed more strongly than formerly in KCSIE, since September 2021.: ‘The school or college should have a clear policy on the use of mobile and 3G smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks.’

This access means that some children, whilst at school or college, sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.’

The additional words in KCSIE ‘bully and control’, along with the omission of the word ‘potentially’ point to the reported increased use of technology as a means of abuse. The College reinforces positive behaviour standards and has a zero tolerance approach to instances of online abuse which features strongly in induction of all

learners.

A web filter system is in use to filter and monitor online use. The system (Securly) also detects keywords associated with: adult content, radicalisation, violence, cyberbullying, illegal content, and hate crime targets (LGBTQ+, BAME, religion, etc) on any device accessed on the college network.

The security of our information systems are reviewed and updated as appropriate. The lead responsibility for Filtering and Monitoring systems is held by the National DSLs and in line with KCSIE 2023, this is explicit in their job descriptions.

The College reviews annually its approach to online safety in line with UKCIS' publication 'Online safety in schools and colleges'.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas:

**Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

**Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.

**Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The College considers the '4Cs' above while reflecting the fact that many young people have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G).

The College seeks to manage this potential risk of harmful behaviour through a series of measures aimed to emphasise a zero tolerance approach. These include an increased focus on learner behaviour and code of conduct policies and agreements, education across all areas of the curriculum and the increased use of posters to reinforce key messages.

## 4.1 We recognise that

- the online world provides everyone with many opportunities; however it can also present risks and challenges
- the increased use of social media platforms by young people since the start of the Covid-19 pandemic and periods of limited face to face contact have heightened the vulnerabilities and risks faced by learners
- we have a duty to ensure that all young people and adults involved in our organisation are protected from potential harm online
- we have a responsibility to help keep young people safe online, whether or not they are using

Access Creative College's network and devices

- all learners, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- working in partnership with young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety.

## 4.2 How we will seek to keep people safe from online harm

- Updating this policy as required, for approval by the chair of the Safeguarding and Prevent Committee and the Executive Leadership Team
- complying with the new published standards for 'Filtering and Monitoring', ensuring that all staff are adequately trained and understand their role in this.
- Providing clear and specific directions to staff and volunteers on how to behave online through our staff code of conduct
- Providing clear guidance on the appropriate use of social media platforms or hubs associated with Access Creative College
- Advising parents and carers of the systems that are in place to filter and monitor online use
- Utilising tutorials, literature and posters to educate young people on identifying potential online safeguarding risks, measures for protecting themselves from these risks, and expected behaviours to protect others. Acceptable learner behaviour is enforced by the ACC Learner Disciplinary Policy and Procedures 2023/24, available on the ACC staff policy portal or on request.

Providing ongoing discussions with the young people using our service about: healthy relationships, abuse and consent, where to go for help and how to report unacceptable activity or behaviour.

- Providing an online safety agreement for use with young people, which all learners must agree to at the start of their studies to develop practices to support and encourage parents and carers to do what they can to keep young people in their care safe online.
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or young person.
- A web filter system is in use (Securly) which also detects keywords associated with: adult content, radicalisation, violence, cyberbullying, illegal content, and hate crime targets (LGBTQIA, BAME, religion, etc) on any device accessed on the college network. Reviewing and updating the security of our information systems as appropriate.
- Ensuring that usernames, logins, email accounts and passwords are used effectively
- Ensuring personal information about the staff and learners who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given.
- Providing supervision, support and training for staff and volunteers about online safety.
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

## 4.3 If online abuse occurs, we will respond to it by

- Having clear and robust safeguarding procedures in place for responding to abuse (including online abuse)

- Providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- Making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- Reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.
- Ensuring that our safeguarding teams manage all cases of suspected or alleged online abuse in line with the principles clearly defined by the UK Council for Internet Safety in their guidance [UKCIS guidance](#)

## 4.4 Responding to cases linked to sexting, sexual abuse and sexual exploitation

Sending and sharing 'nudes and semi nudes' is one of a number of 'risk-taking' behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with online activity can never be completely eliminated. However, Access Creative College takes a proactive approach to help learners to understand, assess, manage and avoid the risks associated with online activity.

We recognise our duty of care to learners who do find themselves involved in such activity as well as our responsibility to report such behaviours where legal or safeguarding boundaries are crossed. It is always our priority to educate learners and support them so that they are aware of activities that are in fact 'criminal' and that through education we help to eliminate these behaviours.

There are a number of definitions of 'nudes and semi nudes' but for the purposes of this policy these are simply defined as:

- Images or videos generated by children under the age of 18, or of children under the age of 18 that are of a sexual nature or are indecent.
- These images are shared between young people and/or adults via a mobile phone, handheld device, computer, 'tablet' or website with people they may not even know.

The College follows the guidance provided in March 23 by the NSPCC for professionals in supporting young people to report nudes shared online using the 'Report Remove' tool.

There are many different levels of inappropriate 'nudes and semi-nudes' and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. However, it is important that ACC applies a consistent approach when dealing with an incident to help protect young people and the organisation.

For this reason, any such case is reported as a safeguarding case and given immediate attention. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response.

The College is committed to supporting learners who experience any form of sexual abuse including online abuse. All staff are sensitive to the needs of victims and respect their right to be taken seriously. In line with KCSIE, victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse,



sexual violence or sexual harassment’.

The focus is to ensure that students understand that the law on child on child abuse is there to protect them rather than criminalise them. In line with KCSIE, the college recognises the importance of explaining to learners that ‘the law is in place to protect them rather than to criminalise them’.

## 4.5 Legal Framework for Online Safety

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect young people in England. The legal framework for the role of the ACC Group is based on the range of activities summarised by NSPCC in September 2021 where key legislation for online abuse is identified as follows:

- Stalking;
- Harassment;
- Improper use of a public communications network;
- Sending indecent, offensive, false or threatening communications;
- Sending private sexual photos or videos of another person without their consent.

The last two bullet points refer to types of abuse which have been reported increasingly as safeguarding cases since the onset of the pandemic and this increase may be partly attributed to the rising use in social media platforms by young people over this period. Refer to section 4.6 ‘Responding to cases linked to sexting, sexual abuse and sexual exploitation’

In addition to the legal framework defined by the NSPCC and summarised above, the Association of Chief Police Officers (ACPO) provides helpful clarity of their position:

‘ACPO does not support the prosecution or criminalisation of children for taking indecent images of themselves and sharing them. Being prosecuted through the criminal justice system is likely to be upsetting and distressing for children especially if they are convicted and punished. The label of sex offender that would be applied to a child or young person convicted of such offences is regrettable, unjust and clearly detrimental to their future health and wellbeing.

‘ACPO does not support the prosecution or criminalisation of children for taking indecent images of themselves and sharing them. Being prosecuted through the criminal justice system is likely to be upsetting and distressing for children especially if they are convicted and punished. The label of sex offender that would be applied to a child or young person convicted of such offences is regrettable, unjust and clearly detrimental to their future health and wellbeing.’

However, there are cases in which children and young people have been convicted and sent to prison. The important thing to remember is that whilst, as a college, we will want to consider the implications of reporting an incident to the police, it is not our responsibility to make decisions about the seriousness of the matter. That responsibility lies with the Police and the CPS, hence the requirement for the college to refer. In summary the sharing of nudes and semi-nudes is classed as illegal as it constitutes sharing and / or possessing an indecent image of a child.

Links to the key legislation are itemised in Appendix 1. (7.1)

Specific guidance from a number of sources, including statutory requirements, informs our policy and how we implement it. A range of guidance sources are shown in Appendix 2. (7.2)

## 5. Allegations against staff, including supply staff, volunteers



## and contractors

Any allegation of abuse made against a member of staff will be dealt with under guidelines contained in Part 4 of 'Keeping Children Safe in Education' (2023).

All allegations, including low level concerns, are reported to the line manager immediately and the written process outlined in 'Allegations against staff involving a learner' is followed. This is available on the ACC Quality Landing Page. This includes the immediate reporting to the Executive Head of People Services who links with the Head of Support, Student Services and Safeguarding. An initial assessment of the allegation is made in consultation with the relevant Local Authority Designated Officer (LADO).

Where the Executive Head of People Services or the Head of Support, Student Services and Safeguarding is the subject of the allegation, the report should be made to the CEO who will then nominate a suitably trained senior manager to act in that capacity.

Where the CEO is the subject of the allegation the report should be made to a National Designated Safeguarding Lead in accordance with the procedure above who will liaise with the Board or other person nominated by the board to deal with the matters identified.

The college whistleblowing policy will also be accessible to all staff so that they can raise concerns about poor or unsafe practice, attitudes or actions of colleagues should the need arise.

## 6. Related policies and procedures

This policy statement should be read alongside our organisational policies (which can be found on our Policy Portal) and procedures (which can be found on the ACC Quality Landing Page) including:

- Managing allegations against staff and volunteers (available on ACC Quality Landing Page)
- Code of conduct for staff and volunteers (available from People Services)
- Learner Disciplinary Policy and Procedure [ACC Learner Disciplinary Policy & Procedure](#)
- Photography and image sharing guidance is provided in ACC's Safeguarding, child protection and Prevent procedures document and follows the advice of the UK Council of Internet Safety [UKCCIS Advice on 'sexting'](#)
- Social Media Policy (available on the Policy Portal)
- This list is not exhaustive.

For more information, please contact your line manager or the Head of Support, Student Services and Safeguarding.

## 7. Appendices

### 7.1 Appendix 1 - Relevant Acts and legislation (Online Safety)

- Computer Misuse Act 1990
- Data Protection Act 2018
- Malicious Communication Act 1998
- Counter-Terrorism and Security Act 2015
- The Education Act 2002 - Section 157 & 175
- Working together to Safeguard children / young people (2018)

- The Mental Capacity Act (2005)

**Summaries of the key legislation and guidance are available on:**

- online abuse [learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse](https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse)
- bullying [learning.nspcc.org.uk/child-abuse-and-neglect/bullying](https://learning.nspcc.org.uk/child-abuse-and-neglect/bullying)
- child protection [learning.nspcc.org.uk/child-protection-system](https://learning.nspcc.org.uk/child-protection-system)
- Statutory guidance for schools and colleges on safeguarding children and safer recruitment  
[Keeping Children Safe in Education](#)
- draft online safety Bill [Draft Online Safety Bill](#)

## 7.2 Appendix 2 - Online Safety: Other sources of guidance:

[Teaching Online safety in schools](#) DfE publication Includes information useful for support and intervention by post 16 providers

Impero Online safety handbook - 'A best practice deployment guide and resource pack for Senior Leadership Teams' UKCIS publication 'Online safety in schools and colleges' [Online safety handbook](#)

- [UK Safer Internet Centre](#) – a partnership between Childnet International, Internet Watch Foundation and SWGfL to promote the safe and responsible use of technology for young people. Their website includes a range of practical resources and support for schools including:
  - [360 degree safe](#) - a free to use self-review tool for schools to assess their wider online safety policy and practice
  - A Helpline – This helpline was established to support those working with children across the UK with online safety issues. Operated by SWGfL, it can be contacted at 0344 381 4772 and [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
  - Safer Internet Day - The UK Safer Internet Centre organises Safer Internet Day for the UK and each year develops a range of materials from assemblies to lesson plans, posters to quizzes, for each Key Stage, to address a key online safety issue.

[UK Council for Internet Safety](#) - The UK Council for Internet Safety expands the scope of the UK Council for Child Internet Safety to achieve a safer online experience for all users, particularly groups who suffer disproportionate harms. The website has useful resources for schools and parents to help keep children safe online including:

- [Education for a Connected World](#) – a framework describing the Digital knowledge and skills that children and young people should have the opportunity to develop at different ages and stages of their lives. It highlights what a child should know in terms of current online technology, its influence on behaviour and development, and what skills they need to be able to navigate it.
- Age-specific advice on potential harms and risks can be found in the following sections of the [Education for a Connected World](#) framework:
  - Online relationships
  - Privacy and Security
  - Online reputation
  - Online bullying
  - Self-image and identity
  - Online reputation
  - Online bullying
  - Health, wellbeing and lifestyle

- [Professionals online safety helpline](#)
- [CEOP Thinkuknow Programme](#): Online safety education programme from the National Crime Agency's CEOP Command which aims to safeguard children from sexual abuse and exploitation. Education resources and online advice for children aged 4 – 18, expert and [support and professional development for the children's workforce](#). Signposts to the [NCA's Click CEOP](#) service for children to report concerns related to sexual abuse.
- [UK Chief Medical Officers' advice](#) for parents and carers on children and young people's screen and social media use, published February 2019.
- [The Anti-Bullying Alliance](#) - A coalition of organisations and individuals, working together to stop bullying and create safer environments in which children and young people can live, grow, play and learn. Their website includes a range of tools and resources to support schools to prevent and tackle cyberbullying.
- [DotCom Digital](#) - a free resource for schools, created by children with Essex Police and the National Police Chief Council Lead for Internet Intelligence and Investigations, to be launched October 2019. The resource aims to prevent young people becoming victims of online grooming, radicalisation, exploitation and bullying by giving them the confidence to recognise warning signs and reach out to an adult for help.
- [Internet Matters](#) – a not-for-profit organisation set up to empower parents and carers to keep children safe in the digital world, they also have a [dedicated section of their website for professionals](#) which includes resources to support staff training, whole school programmes and policies and a [parent pack](#) to help schools engage with parents about online safety.
- [Internet Watch Foundation](#) – an internet hotline for the public and IT professionals to report potentially criminal online content, including child sexual abuse images online.
- [NSPCC learning](#) – includes a range of safeguarding and child protection teaching resources, advice and training for schools and colleges.
- [PSHE Association](#) - the national body for Personal, Social, Health and Economic (PSHE) education. Their programme of study for PSHE education aims to develop skills and attributes such as resilience, self-esteem, risk-management, team working and critical thinking. They also have many guides about how to teach specific topics.
- [SWGfL](#) – a charity dedicated to empowering the safe and secure use of technology. Their website includes a range of free resources for schools covering a range of online safety issues, including digital literacy / critical thinking and consequences of sharing and publishing images.
- [BBC Own It](#) – Support for young people to take control of their online life, including help and advice, skills and inspiration on topics such as friendships and bullying, safety and self-esteem
- [Childline](#) – includes information for pupils on sexting, gaming, grooming, bullying, porn,

relationships. ● [Get Safe Online](#) - provides advice for young people about online abuse

#### For parents/carers:

- [Parent Zone](#) - offers a range of resources for families, to help them meet the challenges of the digital age, including parent guides on the latest digital trends and platforms.
- [Parent Info](#) - from CEOP and Parent Zone, Parent Info is a website for parents covering all of the issues amplified by the internet. It is a free service which helps schools engage parents with expert safety advice, endorsed by the National Crime Agency's CEOP command. This website provides expert information across a range of online harms.
- [Internet Matters](#) – a not-for-profit organisation set up to empower parents and carers to keep children safe in the digital world. Their support for parents includes a range of downloadable guides covering subjects such as transition to secondary school, Vlogging & live streaming, online gaming and cyberbullying.
- [NSPCC - Keeping children safe online](#) Includes a range of resources to help parents keep children

safe when they're using the internet, social networks, apps, games and more.

- [Thinkuknow](#) - National Crime Agency guide for parents/carers for children and young people of all ages
- [Advice for parents and carers](#) - UK Safer Internet Centre

## 7.3 Appendix 3 - Operating and staff guidance general advice

Staff and adults in education are well placed to notice possible signs of abuse, extremism or radicalisation in young people and vulnerable adults because of their regular contact.

Signs of abuse, extremism or radicalisation may be obvious and sudden, for example an injury or the actions of the individual; or part of a picture over a longer period, perhaps including:

- Behaviour that is unusual for the individual, or for their age;
- Work falling behind or lack of interest;
- Isolation or introversion;
- An unexplained change in attendance levels including learners who are 'absent' from education
- Promotion or expression of extreme views or information or a heightened interest in information, electronic or physical, including websites, chat rooms or the repetition of the extreme views of other individuals. It may be that they disclose that approaches have been made to them or others that they are aware of or that pressure has been applied to accept views or doctrines which promote extremist behaviours or have been asked to participate in such behaviour.

### **In all these cases, there are things you should do:**

- Treat the matter seriously and reassure the individual if necessary;
- React to what the individual tells you with belief;
- Listen to what is said carefully but avoid asking probing questions; simply ask any questions needed to clarify what is being said;
- Make it clear that you will probably have to inform others;
- Tell only those who need to know;
- Seek advice if in doubt;

Keep a careful watch on the individual;

- Record what you have noticed using the appropriate safeguarding reporting system, reporting what has happened and what you have done;
- If there is an urgent or serious risk or cause for concern, in addition to using the appropriate reporting system, ensure that you speak with the Designated Safeguarding Lead or a manager so an immediate intervention can be made where appropriate;

disclosure to you, inform them of the action you will take.

There are things you should not do:

- Do not promise to keep the matter secret/confidential, even if the individual asks you to.
- Do not interrogate individuals or ask leading questions.
- Do not contact either Social Services or the Police yourself, contact a Designated Safeguarding Lead in the first instance and use the appropriate reporting system Designated Safeguarding Lead (DSL).
- Do not speak with anyone about whom allegations are made.

## 7.4 Appendix 4 - Reporting & analysis of data

Reports are generated monthly for the Safeguarding and Prevent Committee which meets half termly. The

Committee is chaired by the Chief Operating Officer and in addition to meetings scheduled in advance throughout the year, extraordinary meetings are called in response to any radical changes with the potential to impact on safeguarding cases.

The College uses an industry-standard system, MyConcern, for the reporting and management of safeguarding and Prevent cases. This system enables reports to be generated which show levels and categories of concerns recorded by each part of The Group. Trends and associated issues are identified so that actions can be taken and interventions made. Chronological management of cases is monitored to ensure that all aspects of necessary follow up actions take place in respect of cases raised.

Regular reports with regard to Safeguarding and Prevent protection matters and incidents are regularly presented to ELT and also the ACC Board.

The Board receives and reviews recommendations submitted and determines/approves any amendments to policies and procedures. The Board also notes the outcomes of any serious case reviews or reports from external bodies in determining appropriate arrangements to be implemented.

This aim is to ensure that areas of good practice or changes to policies, procedures and processes are identified and remedial action taken. This includes any liaison with relevant external bodies and agencies that is undertaken. At centre and partner level this data is reviewed in assessing the performance of learners identified as at risk.

## 7.5 Appendix 5 - Staff Recruitment & Training

### Staff recruitment

- The College will employ staff recruitment and selection procedures (and other personnel management processes) that help to deter, reject, or identify individuals who might pose a risk of abuse against young people or vulnerable adults, or are otherwise unsuited to work with them. This includes those individuals identified as having a ‘transferable risk’; a behaviour that may impact on their suitability to work with learners.
- The College will ensure that all staff coming into contact with young people and vulnerable adults have an Enhanced Disclosures and Barring Service (DBS) disclosure (formerly CRB disclosure) on first employment and every three years subsequently.
- The College will ensure that these measures apply to any supply staff employed within the colleges.
- The College will also ensure that other appropriate pre-employment checks are in place including validation of identity, rights to work in the UK and employment history including the appropriate sourcing and receipt of references. Information regarding staff will be maintained on a regular basis and available via a Single Central Record from the Staff HR system.
- The College will employ student recruitment and selection procedures that identify individuals who might pose a risk against young people or vulnerable adults.
- Individuals will be taken on a case by case basis.
- There will be an ongoing programme of training for relevant staff in protection issues and online
- Training providing an introduction to safeguarding in the workplace will form part of the staff induction programme.
- Training will also be provided to relevant staff in respect of the PREVENT duty and the promotion of Core British Values through the curriculum and centre activities. Other training including Equality and Diversity, cultural awareness and risk assessment will also be provided with refresher training carried

out on a regular basis.

- The College will also ensure that a process is in place for measuring and evaluating the effectiveness and impact of training over time.
- Where the College provides educational and/or training opportunities for students under 16 years of age, the relevant local centre Designated Safeguarding Lead will liaise with the school and ensure that appropriate arrangements and protocols to safeguard children are agreed, put in place and monitored.
- Where vulnerable students undertake work placements with the College, a designated person, under the direction of the Centre Manager will liaise with relevant representatives of the learner's host learning organisation or agencies to ensure that appropriate safeguards are put into place.
- Where learners from the College undertake work placements with external organisations, a designated person will liaise with relevant representatives of the host organisation or agencies to ensure that appropriate safeguards are put into place.
- Where vulnerable students or those under the age of 16 engage with the College through participation in, attendance or performance at an external event, there will be a DSL in attendance.
- The College is committed to providing safe working and learning environments and will take appropriate action/measures to ensure the security of all premises and to control access. These measures will aim to minimise the risk of access from dangerous intruders or persons deemed unsuitable to work with or support staff and/ or learners.

## Staff training

- All staff will undertake initial safeguarding awareness training as part of induction processes on first appointment and undertake periodic updating through a variety of methods including online or e-learning, in house training and briefings.
- A revised updated policy is introduced in all mandatory staff training sessions ahead of the start of each academic year. All staff are required to read Part 1 of Keeping Children Safe in Education and full compliance with this is mandatory.
- All staff receive refresher training including online safety training throughout the year as necessary to reflect changes and address training needs.
- All Group Designated Safeguarding Leads are trained to at least level 3 standard and also work closely with relevant local agencies. Refresher training is undertaken on a regular basis with certificated training being undertaken every 2 years.
- The College's 'National' Designated Safeguarding Leads based in Central Services are trained and certificated to a minimum of level 3 which is re-certificated every 2 years. National DSLs liaise with and support centre DSLs and appropriate external agencies and undertake regular CPD activities in respect of their role.

## 7.6 Appendix 6 - Data Protection & UK GDPR

The College recognises that the welfare of children, young people and adults is paramount. The provisions of data protection and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children or adults safe. Legal and secure information sharing between education organisations, Children's and Adult Social Care, the police and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

## 7.7 Appendix 7 - Radicalisation - Vulnerability/risk indicators



The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable young people and adults experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a young person, adult or their family may be vulnerable or involved with extremism:

## Vulnerability

**Identity crisis:** Distance from cultural/religious heritage and uncomfortable with their place in the society around them.

**Personal crisis:** Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from an existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging. Personal circumstances:

**Migration;** local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

- **Unmet aspirations:** Perceptions of injustice; feeling of failure; rejection of civic life. - **Criminality:** Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

## Access to extremist influences

- Reason to believe that the young person associates with those known to be involved in extremism.
- Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence.
- Use of closed network groups via electronic media for the purpose of extremist activity.

## Experiences, behaviours and influencers

- Experience of peer, social, family or faith group rejection;
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour;
- Verbal or written support of terrorist attacks;
- First-hand experience of racial or religious hate crime;
- Extended periods of travel to international locations known to be associated with extremism;
- Evidence of fraudulent identity/use of documents to support this;
- Experience of disadvantage, discrimination or social exclusion;
- History of criminal activity;
- Pending a decision on their immigration/national status.

## More critical risk factors include:

- Extremist recruiters;
- Articulating support for extremist causes or leaders;
- Accessing extremist websites, especially those with a social networking element;
- Possessing extremist literature;



- Justifying the use of violence to solve societal issues;
- Joining extremist organisations;
- Significant changes to appearance/behaviour

## 7.8 Appendix 8 - Modern Slavery & Human Trafficking

Modern Slavery and Human Trafficking are defined in the Modern Slavery Act 2015 as: Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the Act, which can be found at:

**gov.uk - Section 1**

**gov.uk - Section 2**

### Slavery and Servitude Slavery

Slavery and Servitude Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

### Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

### Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: [www.legislation.gov.uk/ukpga/2015/30/section/3/](http://www.legislation.gov.uk/ukpga/2015/30/section/3/) enacted.

Recent figures from the UK National Crime Agency (NCA), show that the most prominent exploitation type recorded for potential victims first exploited as a child (where this is known), was labour trafficking.

For further information on modern slavery and the College's approach to tackling it, please refer to our Modern Slavery Policy.

## Working Together to Safeguard Children 2018

Provides statutory guidance on the roles and responsibilities of agencies working together to safeguard children/young people. Additionally, it sets out the revised framework for the multi agency partnership approach to the coordination and management of safeguarding and child protection.

Source: **gov.uk**

## The Protection of Children Act 1999

Came into force in October 2000 and introduced the Protection of Children Act (PoCA) List in which the Secretary of State has a duty to record the names of individuals who are considered unsuitable to work with children.

Source: [gov.uk](#)

## The Children's Act 1989

Sections 27 and 47 of the **Children's Act 1989** place duties on a number of agencies, including local authorities (and therefore, indirectly, local education authority maintained schools) to provide assistance to social services departments acting on behalf of children in need (s27) or investigating allegations of abuse (s47). Authorisations made in 1993 and 1994 brought City Technology Colleges (CTCs), colleges of further education and Education Associations within the scope of sections 27 and 47 of the Children Act.

Source: [gov.uk](#)

## Care Act 2014

In addition to the above, further information relating to child protection can be found at: [gov.uk](#)

Information about the Disclosures and Barring Service and the requirements for DBS checks together with a range of supporting information can be found at: [gov.uk](#)

## The Modern Slavery Act 2015

Information about Modern slavery and human trafficking can be found at: [gov.uk](#)

## Statutory Guidance

[Keeping Children Safe in Education](#) - September 2022

[Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism](#)

## Advisory guides

[Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers](#)

[Safeguarding adults: sharing information | SCIE](#)

Any questions, comments or suggestions regarding this document should be directed to:

### Ian Topping

Head of People Systems

07823 772558

[ian.topping@accesstomusic.ac.uk](mailto:ian.topping@accesstomusic.ac.uk)

or

**Marc Inchley**

Head of Support, Student Services and Safeguarding

(insert tel no)

[marc.inchley@accessmusic.ac.uk](mailto:marc.inchley@accessmusic.ac.uk)

## 7.10 Appendix 10 - Useful Support Contacts

### **NSPCC**

(National Society for the Prevention of Cruelty to Children) Helpline staffed by social workers offering support, information and advice for anyone concerned about child abuse. Guidance can be sought on a confidential basis.

Freephone: 0808 500 5000 (24/7)

**nspcc.org.uk**

### **Childline**

Confidential helpline for children and young people who are in danger or have any type of problem. Freephone: 0800 1111 (24/7)

**childline.org.uk**

### **Kooth**

An online support service for children and young people

**www.kooth.com**

### **Family Lives (previously Parentline)**

Confidential information and support for parents facing problems in their families. Freephone: 0808 800 2222 (24/7)

**familylives.org.uk**

### **Respond**

Challenging vulnerability and sexual abuse in the lives of people with learning disabilities. Freephone: 0808 808 0700

**respond.org.uk**

### **Think U Know**

CEOP's Internet Safety website with support and information for parents teachers and young people on online safety and child protection

**thinkuknow.co.uk**

### **Drink Aware**

Offering information, support, guidance and resources relating to drinking and drink related issues

**drinkaware.co.uk**

### **Hope UK**

Hope UK works with communities throughout the UK to prevent drug and alcohol-related harm to children and young people.

**hopeuk.org**

### **Frank**

Confidential drugs advice.

**talktofrank.com**

**FAST Families Against Stress and Trauma**  
**families-matter.org**

**Let's Talk About It**  
**ltai.info**

**National Police Chiefs Council**  
ACPO guidance for Police in relation to education and training.  
**npcc.police.uk**

**Modern Slavery Helpline**  
**modernslaveryhelpline.org**

**Internet Matters**  
Online safety advice and guidance:  
**internetmatters.org**

**Educate.Against.Hate**  
Online resources, advice and information on protecting young people from extremism and radicalisation:  
**educateagainsthate.com/**

**SafeCall**  
SafeCall offers support to victims of exploitation, young people can contact SafeCall directly or can be referred to SafeCall by professionals as part of services offered by  
**missingpeople.org.uk**

**MIND**  
MIND is a mental health charity providing support and resources to people to help deal with mental health issues.  
**mind.org.uk/**

**NHS**  
The NHS provides guidance and support for mental health issues under its One You Every Mind Matters hub.  
**nhs.uk/oneyou/every-mind-matters/ 23**