Dō University: Protection of Students, Apprentices, and Higher Education and adults at risk

(Child Protection, Electronic Security and Prevention)

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1 Introduction

1.1 The Dō University Group (the Group) is committed to protecting all our students, trainees, and adults at risk. The fundamental principles of this policy are based on the legislation and also in the moral duty of safeguard the welfare of students, apprentices and adults at risk receiving education, training and care in the Group, including students/adults at risk outside the premises and

to those in practice/apprenticeship.
Excursions or trips. This policy focuses primarily on in the protection of students and adults at risk. Any updates will be integrated and disseminated appropriately.

1.2 Through this policy the Group aims to:

- Minimize risks to the health and well-being of students, learners, and at-risk adults.

- Promote safe practices and combat poor and unsafe practices
- Identify instances where there is cause for concern for the well- of being of at-risk students and adults and take steps to keep them safe.
- Allow students, learners, and at-risk adults to raise safety concerns and have them acted upon.

- Take appropriate measures to prevent unsuitable individuals from working with our students and at-risk adults.

- Ensure staff receive appropriate training and supervision regarding child protection, safeguarding, e-security, and prevention.

1.3 To achieve these objectives, the Group Leadership Team (GLT) will approve and annually review policies and procedures with the aim of:

- Raise awareness on issues related to well-being and promoting a safe learning environment for at-risk students and adults.

- Help identify students and adults at risk of significant harm and provide procedures for reporting concerns.

- Establish procedures for reporting and addressing allegations of abuse against a staff member

1.4 Safeguarding students, learners, and adults at risk encompasses more than just child protection. When working with students, issues such as child sexual exploitation (CSE), child abuse, health and safety, online safety (including filtering and monitoring of school devices and networks), radicalized behavior, young carers, mental health and well-being, managing bullying and sexual harassment (see Annex 3), and measures to meet the needs of students with medical conditions should all be considered.

the provision of first aid and other similar requirements. There are separate policies that should be read in conjunction with this policy (paragraph 2.4).

2 Scope of this policy

2.1 This policy applies primarily to students, apprentices and adults at risk (those under the age of 18 in our care or 25 if deemed at risk; for example, students with disabilities and/or learning disabilities and those with mental health conditions) and applies, with appropriate adaptations, to reporting abuse and safeguarding adults at risk.

2.2 The safer contracting aspects of this policy are

apply to all staff, volunteers and

Agency workers. They have also established

procedures with subcontractors, collaborators and

foster families.

2.3 All staff must read and understand Keeping Children Safe in Education 2025 Part 1. This is statutory guidance from the Department for Education.

Keeping Children Safe in Education 2025

2.4 This policy should be read in conjunction with the
following:

- Personal Relations Policy
- Health and safety policy
- Care, support and medication policy
- Recruitment and Selection Policy
- Complaints policy (including harassment and bullying)
- The Staff Code of Conduct and   the guide
  complementary "Personal professional limits"   for the

- Student anti-bullying policy
- Computer security policy
- Acceptable Use Policy
- Freedom of Expression Policy and Guest Speakers
- Data Protection Policy
- Whistleblowing policy and procedure
- Positive behavior management (including study skills)

- First Steps Childcare Child Protection Policy

2.5 Policy changes will be disseminated through the Group Management Teams.

2.6 This policy will be used objectively and free from discrimination, in
accordance with the Group's Equity, Diversity and Inclusion Policy,
the Recruitment and Selection Policy, and the Disciplinary Policy
and Procedure.

3   Statutory responsibilities and background

3.1 The Children Act 2014, which is fundamental for people working with children and young people in the UK.

3.2 The Education Act 2002 requires that the governing bodies of higher education providers have a statutory duty to take steps to safeguard and
Promote the well-being of at-risk students and adults.

3.3 The Sexual Offences Act 2003 makes it an offence for a person over the age of   18 years (for example, a sexual member of the staff) maintain   relationship with a   under 18 years when said person holds a position of trust with respect to said minor, even if the relationship is consensual. This applies when the minor attends full-time education and the person works at the same school as them, even if they do not teach them.

3.4 The Group takes into account guidance issued by the Department for Education, the Outreach and Exclusion Service and other relevant agencies and groups.

3.5 The Protection of Vulnerable Groups Act of 2006, which sets out the types of activities in relation to students and adults at risk to which employers and individuals will be subject.

3.6 The Protection of Freedoms Act 2012, which amended the

definition of Regulated Activity, including who is eligible for a prohibited checklist.

3.7 Child Protection in Education 2024 and Child Protection Partnership 2023. This is statutory guidance from the Department for Education. Schools and colleges should consider it when exercising their functions to safeguard and promote child welfare.

3.8 The Equality Act 2010 is important to protect students from unlawful discrimination due to their protected rights, characteristics, how to support those with characteristics
                    protected and where to address the disadvantages proportional   they face
students.

3.9 FGM Act 2003. Section 5B of this Act introduces a reporting obligation for health and social care professionals and teachers in England and Wales to report to the police any known cases of FGM involving children under the age of 18 that they identify in the course of their work. This obligation came into force on 31 October 2015. Sexual Violence and Harassment Among Children in Schools and Education Settings (2018). This guide highlights recommendations for preventing and addressing sexual violence and harassment among students.

3.10 The College will notify General Enquiries at the Education and Skills Funding Agency - GOV.UK (www.gov.uk) where a referral has been made by the College or a College Related Party in any of the following circumstances (such notification must include the name of the institution, a high level summary of the nature of the incident (without the sharing personal information about the victims or alleged of the perpetrators) and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and/or the police):

- a safeguarding concern relating to sexual violence with the Local Authority for Children's Social Care/Adult Social Care and/or the police, or

- a complaint of abuse made against a teacher, professor or other staff member to the designated official(s) (in the local authority).

- The group protection officer will provide this information

3.11 The Group is committed to working with the departments of local children and help them with protection issues children and undertakes to maintain liaison with the Board Local Child Protection Board (LSCB) and the Local Authority Designated Official (LADO) acronym in English).

3.12 In the event of the sudden death of a student or adult at risk, the Group has its own policy statement and procedures that establish clear lines of responsibility to ensure proper notification and dissemination of information.

3.13 The Group is working in collaboration with the Community Safety and Prevention teams to implement the Prevention strategy, which covers all forms of extremism and focuses on preventing radicalization through three key objectives:

• Challenging the ideology that supports terrorism
• Protecting vulnerable people
• Support sectors and institutions where there is a risk of radicalization

4 Definitions of abuse

4.1 With respect to this policy, the Group recognizes the following definitions of abuse:

- **Bullying:**Harassment is the repeated and intentional harming of a person or group by another person or group, where the relationship involves an imbalance of power.

- **Physical abuse:**Physical abuse causes harm. It can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocation. It can be deliberate or reckless, or the result of a deliberate failure to prevent injury. Physical abuse can also occur when a parent, guardian, or caregiver fabricates symptoms or induces illness in a student.

- **Neglect:**Neglect is the persistent or severe failure to meet the basic physical or psychological needs of a student or adult in I risk. This will result in a serious deterioration in their greeting development.

- **Sexual abuse:**Sexual abuse involves a student or at-risk adult being forced or coerced into participating in or witnessing sexual activity. The student or at-risk adult need not be aware that the activity is sexual, and their apparent consent is irrelevant. It also relates to sexual abuse in terms of digital safety and child sexual exploitation, such as inappropriate images, videos, and evidence of bullying.

- **Non-contact abuse:**Non-contact abuse is when the abusive acts do not involve actual physical contact, i.e., pornographic or violent films, sexual acts performed in front of the victim, or violent acts with the abused person present.

- **Emotional abuse:**Emotional abuse occurs when there is persistent emotional mistreatment or rejection. It causes serious and adverse effects on the behavior and emotional development of the at-risk student or adult, resulting in low self-esteem. Some degree of emotional abuse is present in all forms of abuse.

- **Financial abuse:**Financial abuse is the misuse of a person's funds and assets; obtaining property and funds without their knowledge and full consent, or in the case of an incapacitated elderly person, without their consent. This is also known as material abuse. Financial or material abuse may involve the theft or misuse of a person's money or property.

- **Radicalization and extremism:**Radicalization refers to the process of supporting terrorism and extremist ideologies and, in some cases, subsequent participation in terrorist activities. Extremism is defined as open or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs.

- **Terrorism:**Terrorism is an action that endangers or causes serious violence to a person or persons, causes serious property damage, or seriously interferes with or disrupts an electronic system. The use or threat must be intended to influence the government or intimidate the public and advance a political, religious, or ideological cause.

- **Discriminatory abuse:** Discriminatory abuse is motivated by oppressive and discriminatory attitudes. Some examples of discriminatory abuse include:
  - disability: physical or learning disability, mental disability, poor health, or sensory impairment

  - career
  - gender
  - age
  - religion
  - cultural background
  - sexual orientation
  - political convictions
  - appearance

- **Toilet:** Sexual harassment involves establishing an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation, or trafficking. Children and young people can be victims of sexual harassment online or in person, by a stranger or someone they know, such as a family member, friend, or professional.

- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCC):** Both child sexual exploitation and child criminal exploitation are forms of abuse in which a person or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into participating in sexual or criminal activity. Individuals or groups, men or women, children or adults, can commit this abuse. It can be a one-time or prolonged incident. County Lines: Criminal exploitation is a geographically widespread form of harm, a typical feature of criminal activity in County Lines; drug trafficking networks or gangs entice children and young people to transport drugs and money from urban to suburban and rural areas.

- **Cyberbullying:** Cyberbullying is bullying that occurs through digital devices such as mobile phones, computers, and tablets. It can occur via SMS, text messages, and apps, or online.

  Social media, forums, or games where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or cruel content about another person. It can include sharing personal or private information about another person that causes embarrassment or humiliation. Some cases of cyberbullying escalate into illegal or criminal behavior.

- **Forced marriage** Forced marriage is when one or both people do not consent to the marriage and pressure or abuse is used.

  Pressure can include threats, physical or sexual violence, and economic pressure. All child marriages are forced, as a child cannot give informed consent, and therefore constitute a violation of their rights.

- **Female Genital Mutilation (FGM):**Female genital mutilation (FGM) is a human rights violation, a form of torture, and an extreme form of violence and discrimination against girls and women. It is most commonly practiced on girls between the ages of 15 and 15, although it is occasionally also practiced on adult women.

- **Significant damage:**Some children may be in need because they are suffering or are at risk of suffering significant harm. The Children's Act introduced the concept of significant harm as the threshold justifying compulsory intervention in family life in the best interests of the child.

- **Sexual violence and sexual harassment among boys and girls:**
  Additional guidance on sexual violence and child sexual harassment in schools and colleges has been published (May 2018).
  The referral process is tailored to any security concern, but the Group must act quickly and ensure a risk assessment is conducted. This assessment should consider:

  - The victim
  - The alleged perpetrator
  - All other children and, if applicable, other adults, children and staff.

- **Missing children in education:**The absence of children in education is often an indicator of other potential protection issues. The Group should have measures in place, through its attendance reports and follow-up procedures, to ensure follow-up and of students who may be "missing in education." This may be the

  a warning sign for various protection issues, such as sexual abuse, sexual exploitation, or criminal exploitation of children.

- **Domestic abuse:**Any incident or pattern of incidents of controlling, coercive, threatening, violent, or abusive behavior between individuals aged 16 or over who are or have been partners or family members, regardless of gender or sexuality. The Police are committed to combating crime and disorder, and supporting public protection, and regularly collaborate with educational institutions. The Group is participating in this initiative, known as Operation Encompass. It is a joint interagency process that provides early intervention and appropriate support to at-risk students and adults who have been involved in or exposed to domestic violence. Domestic violence can include psychological, physical, sexual, financial, or emotional violence. Children can be victims of domestic violence. The impact on children of seeing, hearing, or experiencing the effects of domestic violence, or of experiencing it through their own intimate relationships.

- **Child on child abuse:**This may include, but is not limited to, bullying (including cyberbullying), violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling or any other
  Other forms of physical harm; sexting and ritual violence and hazing between students; sexual violence, such as rape, penetrative assault, and sexual assault; sexual harassment, such as sexual comments, remarks, and jokes; and online sexual harassment, which can stand alone or be part of a wider pattern of abuse. The Department for Education has published a document with recommendations for governing bodies, proprietors, school leaders, leadership teams, and designated safeguarding officers: Sexual Violence and Harassment Between Children in Schools and Colleges (September 2021).

- **Above the baseboard:**The Voyeurism (Offences) Act, commonly known as the Upskirting Act, came into force on 12 April 2019. Upskirting generally involves taking a photograph under a person's clothing without their knowledge, with the intent to view their genitals or buttocks for sexual gratification or to cause humiliation, distress or alarm to the victim.

- **Homeless people:**Being homeless or at risk of becoming homeless poses a real risk to a student's well-being. The DSL and any other officer should be aware of the contact details and referral pathways to the Local Housing Authority so they can raise and resolve their concerns as quickly as possible.

- **Manufactured or induced disease:**(FII is a form of abuse associated with a range of poor outcomes for children and young people, which can range from serious harm to or even death of the child.
A parent's or caregiver's behavior may be harmful to a child or young person. FII can occur when a child or young person also has a confirmed diagnosis of an illness or disability, and the two may coexist, but the behavior or presentation of seeking medical attention is not what is expected for the condition or disability. – NHS

- **Honor-based abuse:**This can be a form of abuse that may be linked to certain practices related to culture, faith, and beliefs, and which can put young people at risk of abuse.

- **Serious violence:** There are indicators that may indicate a child is at risk of becoming a victim of or being involved in a serious violent crime. These may include increased school absenteeism, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, signs of aggression, or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or firearms. All staff should be aware of the associated risks and understand the measures in place to manage them. Advice is provided in the Home Office Guidance on Preventing Youth Violence, Gang Involvement, and the Criminal Exploitation of Children and Vulnerable Adults: County Lines.

5   Disclosures

5.1 When a staff member suspects that a student, apprentice or adult at risk is being abused, they should:

- Allow the person to speak without interruptions.
- Never trivialize or exaggerate the issue.
- Never make suggestions
- Do not coach or lead in any way
- Reassure the person and let them know that they were right to report the issue.
- Always ask enough questions to clarify understanding, but do not probe or interrogate.
- Be honest: The staff member should let the person know that it cannot be kept a secret and that it will be necessary to tell someone else.
- Try to stay calm, remembering that it is not easy for them.

- Not showing emotion: Showing anger, disgust, or disbelief can prevent the person from speaking. This may be because they feel they are upsetting the staff member or because they feel the staff member's negative feelings are directed toward them.

- Let the person know that you are taking the matter very seriously.
- Make them feel safe and secure without causing them more anxiety.

- Make a written record of what happened as soon as practically possible.

• If the staff member feels that the issue requires immediate attention, they should contact the Duty Safeguarding Officer (contact details in 5.10).

5.2 The staff member must submit the referral/concern through Safeguard

5.3 If the concern is not urgent, the staff member should log it through Safeguard to allow concerns to be recorded.

5.4 The concern should be objective and not contain the staff member's opinions or analysis. Terms such as "I think..." and "In my opinion..." should be avoided.

5.5 The staff member will receive an email

automatic through Safeguard to confirm the

reception.

5.6 The Safeguarding Officer can advise and provide support to the staff member; the Counseling Team is also available.

5.7 Designated Safeguarding Officers:

• You will know how to make an appropriate referral
• Will be available to provide advice and support to other staff on issues related to child protection, safeguarding, e-safety, and prevention.

• Have the responsibility to be available to listen

to at-risk students and adults who are studying

in the Group.
• Will handle individual cases, including attending case conferences and review meetings as appropriate.
• Have received training in child protection and inter-agency work, as required by the LSCB, and will receive refresher training at least every two years.

5.8 In the event that the Designated Protection Officers are unavailable, the Director of Protection or the Executive Director should be contacted.

5.9 All staff and governors are responsible for complying with this policy, reporting incidents and cooperating with any investigation or incident in accordance with procedures.

5.10 There is a duty protection officer on duty at all sites; to contact the duty officer:

Dō UNIVERSITY PRIVATE LTD
    with registered office at C/27
OLD GLOUCESTER STREET
 (WC1N 3AX) LONDON UK
admin@vae-universityuk.uk

5.11 Supervision of Protection Officers will be provided through the Group Advisory Service or through an external provider.

5.12 A Protection and Prevention Board meets quarterly

to oversee broader Safeguarding Policy and Procedure

responsibilities, review regulatory guidance, and conduct live cases;

where appropriate, a case review will be conducted to learn and

share practices.

5.13 The objective of the Protection and Prevention Board is:

- Ensure that the Group provides the highest quality care

    for all students, with

    improved arrangements and adults at risk.
- Minimize the risk of harm to our students and at-risk adults.

- Address concerns about the well-being of

    our students and adults at risk.
- Identify and respond to at-risk students and adults who may be
    experiencing significant harm and take appropriate action.

- Comply with your legal requirements related to

    safeguarding issues

5.14 The Protection Teams meet weekly to analyze

Relevant cases will be discussed and practices will be shared across

each campus. Where appropriate, and a potential risk of harm is

identified, they will create and implement safety plans and risk

assessments, making necessary adjustments to ensure at-risk students

and adults can access learning opportunities. This will be done in

collaboration with identified members of the Curriculum and Support

Teams. Meetings are chaired and supervised by the relevant

Safeguarding Manager.

5.15 Informally, protection team members work together daily to discuss cases. In addition, there is a formalized meeting structure:

- Regular meetings with protection teams to formally discuss people's safety as a serious case review in each

  place.
- Two meetings per semester with the Director of Protection and the Protection Managers to review protection organizational and prevent and consider serious cases.
- Quarterly protection and prevention updates for the Group Leadership Team
- Quarterly updates of the protection and prevention risk assessment with review of the record of risks
- Quarterly reports of protection of Dō University presented to the Protection and Prevention Board and to the Governors

- Bi-annual meeting between the Protection Governor and the
  Protection Director to ensure effective systems are in place
  and to discuss any issues or
  strategic concern.
- Monthly meetings between the Protection Manager and the Support Manager
  Pastoral and SEND Manager to share information related
  to students in
  risk and any problems or concerns.
- Monthly meetings between the Protection Manager and the
  Learning Manager to share information related to at-risk
  students and any workplace and/or university-related concerns
  or issues.

- Monthly meetings between the Safeguarding Manager and the
  Teaching and Learning Managers to share information related
  to at-risk students and any issues or concerns.

- Weekly meetings between the Protection Manager and
  the director to discuss serious problems/concerns
- Monthly meetings with the Director of Protection and the
  Director of Human Resources to review and monitor low-
  level staff concerns and allegations.

6   Procedure for dealing with students aged 14 to 16

6.1 The overall responsibility for safeguarding students aged 14 to 16 rests
with the referring school or authority. However, this does not preclude
staff from taking immediate and appropriate action in the event of a
report. Schools and local authorities must be informed immediately to
ensure a collaborative and transparent approach.

6.2 Children in care, children formerly in care who have left care, children
with social workers
and students with needs up to the age of
special educational   25 can also
need additional services, assistance, protection, and consideration.
Under this policy, they receive support from the Care and Aging Care
Manager, the Additional Learning Support Team, and the wider
student support teams.

7 Prevent

7.1 University Dō is committed to provide to the students and apprentices the skills and the knowledge needed to keep themselves and others safe; education, like other key sectors, has a responsibility to promote the values of openness and tolerance and facilitate the free debate that is a hallmark of British citizenship.

7.2 The cluster approach is based on the national strategy known as competition, which includes four key elements: pursue, prevent, protect and prepare.

7.3 All concerns related to the duty of prevention will be addressed by the College's DSLs in collaboration with the Director of Protection and the Executive Director. The director is the person primarily responsible. The following have been established: procedures for reporting concerns to local authority prevention teams and the Department of Education.

7.4 All staff are expected to undergo awareness training and will receive support from the safeguarding team when concerns arise within the scope of their prevention duties.

7.5 Report on protection and prevention incidents, as well including the as review the plan of action of prevention and risks of the university group. The evaluations are monitored through the Board Protection and presented annually to the Governors.

8   Allegations against staff

The main one   The Group's concern is to ensure the security of   their students, apprentices and adults in risk. It is essential that, in all cases of suspected abuse by a staff member, action be taken swiftly and professionally, regardless of the veracity of the incident. It must be made clear that suspension does not imply culpability.

If any staff member suspects another staff member of abusing a student or at-risk adult, it is their responsibility to inform the Director of Safeguarding or the Safeguarding Managers, unless they themselves are the suspect. The Director of Human Resources must be notified. The Director of Safeguarding will inform the Student Safeguarding Office (LADO) within 24 hours of the concern or report being raised and will agree with them on the action to be taken.

All allegations of this nature will be thoroughly investigated. The investigation will be conducted promptly and within the principles of impartiality and consistency.

If the complaint concerns the Chief Executive, the Executive Director, or the Director of Safeguarding, the matter should be referred to the Governor-Designate, who will discuss it with the Chair of the Board of Governors, in addition to following the usual safeguarding procedure. Staff may also contact the LADO directly.

To request a call back, please send an email
0-19.SPOA@eastsussex.gov.uk or call the One Stop Shop   Access   to the
01323464222
Brighton and Hove 01273 290400
LADOenquiries@brightonhove.gov.uk

Concerns about any staff member can also be discussed with the Group Human Resources Director.

9   Allegations that do not meet the harm threshold

Any staff member who has concerns about another member of the staff must report them. These concerns are known as "mild concerns." They should report to a member of the Protection team or Human Resources.

"Mild concerns" can manifest in a variety of ways, but they indicate behavior that exceeds the expectations of those who work with children, young people, and vulnerable adults. This behavior does not comply with Dō University's Code of Conduct or professional expectations. Some examples include being overtly friendly with a student, using inappropriate language, or having close physical contact with them.

All complaints are reported and recorded in a registry confidential information kept by the HR team. Each complaint is reviewed and the relevant measures are agreed upon. It can be requested advice from the Offenders Affairs Office if it is

necessary.

Low-level concerns may be raised about any adult working with young people and vulnerable adults, including volunteers, contractors, and supply staff.

10   Allegations about employers

Employers and their staff play a key and growing role in supporting and delivering education, training, and assessment. Any suspected abuse by an employer or its staff must be investigated promptly and professionally, regardless of its veracity. The Commercial Director or Associate Director of Employers and Stakeholders has the right to suspend collaboration with an employer while the investigation is ongoing.

If any member of the university team is reported to have alleged abuse by an employer, that member is responsible for reporting their concerns to the Director of Safeguarding or the Safeguarding Managers. The Director of Commercial Affairs or the Associate Director of Employers and Stakeholders must also be notified. The Customer Relations Office (LADO) must be notified within 24 hours of the concern or report being raised.

Depending on the outcome of the investigation, the Associate Director of Employers and Stakeholders or the Director of Commercial Affairs has the authority to suspend or terminate the employer's contracts, as well as blacklist the employer from future apprenticeships, placements, or university engagement activities.

10   Designated personnel with safeguarding responsibility

10.1   The Group Safeguarding Officer is the Executive Director. In his or her absence, this role will be assumed by the Director of Safeguarding. All university directors will be responsible for the safeguarding of their institution. Each university has a Safeguarding Manager, who is the Deputy Assistant Director of Safeguarding.

10.2   The Group Leadership Team (GLT) has the key responsibility of leading staff awareness on wellbeing issues and promoting a safe environment for at-risk students and adults learning within the Group. The GLT ensures that all staff receive basic safeguarding training, including Prevent, appropriate to their roles, and are aware of the Group's safeguarding procedures. They also ensure that parents, guardians, or carers of at-risk students and adults within the Group are aware of the Group's Safeguarding Policy.

10.3 Safeguarding Officers are responsible for:

- Oversee the referral of suspected abuse cases or complaints to investigative bodies relevant.
- Provide advice and support to other staff on security-related issues.
- Maintain an appropriate record of any safeguarding referral, complaint or concern (even where such a concern does not lead to a derivation).
- Establish links with the relevant local authority,

    LSCB and LADO and other appropriate agencies.
- Establish links with employers and training organizations that host long-term internships from the Group to ensure that appropriate safeguards are in place.

• Ensure that staff receive basic training in security issues, including prevention, appropriate to their duties and that they are aware of the Group's security procedures.

• Establish links with secondary schools to ensure appropriate action is taken for pupils who may be at risk or subject to a CP or CIN plan.

• Ensure the Group is represented at case conferences and review meetings as appropriate.

10.4   The Safeguarding and Prevention Board will submit an annual report to the Group's Governing Body detailing the Group's performance of its functions (with the support of the Governor responsible for Safeguarding). It is responsible for informing the Governing Body, as soon as possible, of any deficiencies in policies or procedures identified by the Administration's Safeguarding Office (LADO) or other entities. Safeguarding Managers will ensure consistent implementation of all safeguarding processes and procedures across the the institution, as well as the review and oversight of appropriate and quality standards.

10.5   The Director of Information and Funding Services and their team will ensure that structures and processes are in place to ensure the Group has appropriate contact information for parents, guardians, and carers of all students up to the age of 18 (or 25 for students with learning difficulties or disabilities). The role of the Safeguarding Leads is to work closely with strategic leaders to monitor the outcomes of these children and young people.

Director of Safeguard

Safeguard ia Manager Chichester

Safeguard Manager Crawley/Brinsbury

Safeguard ia Manager Worthing/ Northbrook

Safeguard to Manager and GB MET/HH

Safeguard Equipment

Safeguard Equipment

Safeguard Equipment

Safeguard Equipment
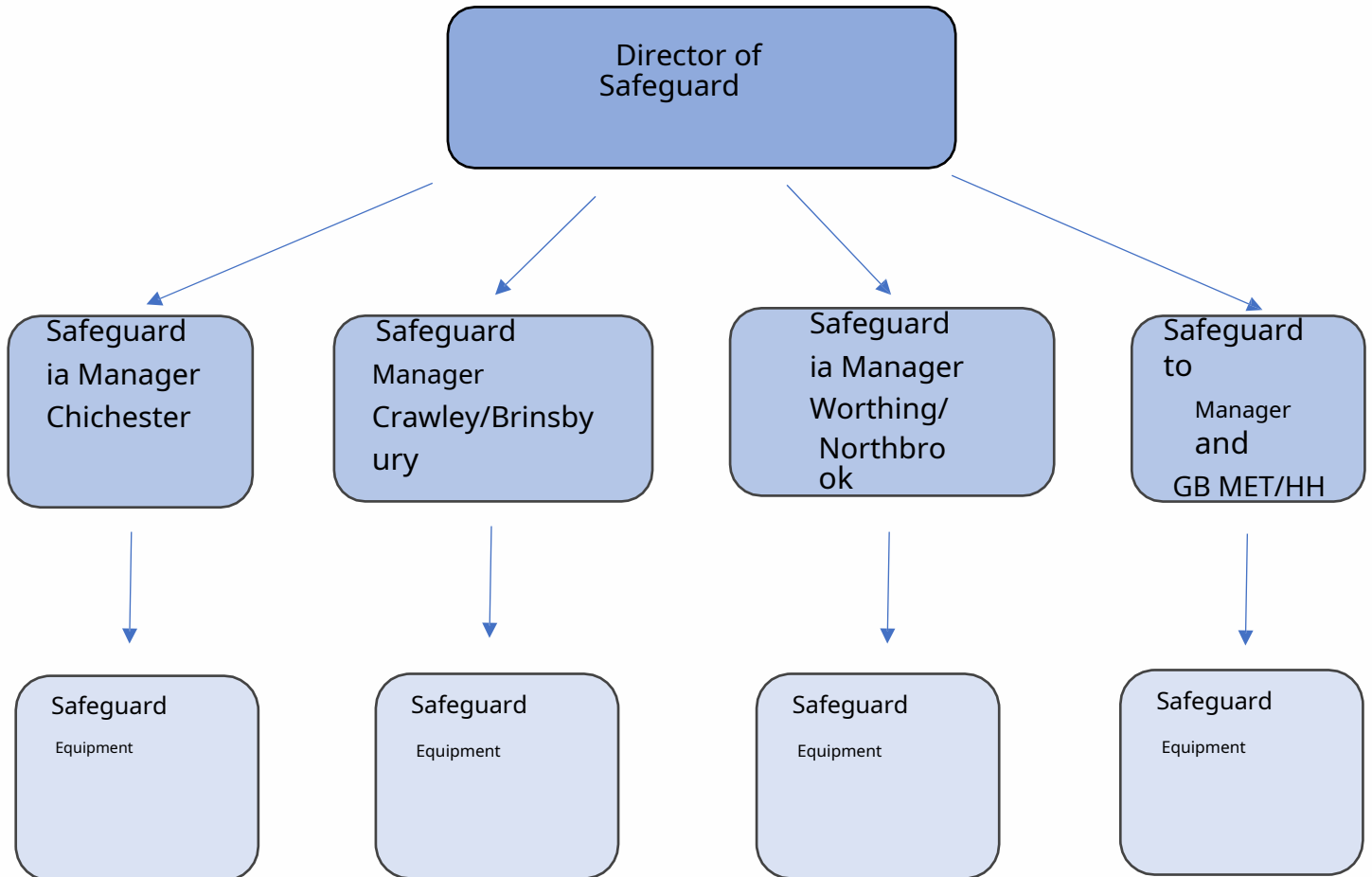
More extensive protective equipment:

14-16 Layout – Teaching and Learning Manager
Accommodation – Head of Accommodation
Apprentices – Deputy Director of Apprentices
Higher Education – Deputy Director of Higher Education

11.1 The team is fully trained in all aspects of the

protection and receives refresher courses every two years. It has

provided additional training in areas such as

awareness about transgender people, mental health,

self-harm, suicide prevention, drug abuse

substances and alcohol, attachment disorders, interaction

inclusive family planning (IFP), early intervention and prevention, misinformation/disinformation, trauma-related practice.

12 Governor-designate

12.1 There is a designated Governor as a member of the Governing Body with responsibility for Child Protection, Safeguarding, eSafety, and Prevent Implementation. All Governor staff receive appropriate training in child protection and safeguarding during induction and at regular intervals thereafter.

12.2 The Governor Designate is responsible for communicating

with the person designated with primary responsibility

on matters related to Child Protection,

Safeguarding, Electronic Security and Prevention,

ensuring that:

• The Group has procedures and policies that are consistent with the LSCB procedure
• The Board of Directors reviews the Group's policy on child protection, safeguarding, electronic security and prevention each year.
• Each year, the Governing Body is informed of how the Group and its staff have complied with the policy, including, but not limited to, a report on the training undertaken by staff.

12.3 The Governor Designate is responsible for overseeing communication between agencies, such as the Police and Social Services, regarding complaints against the GLT or the designated person. This will not involve conducting an investigation, but rather ensuring good communication between the parties and providing information to facilitate investigations.

12.4 To perform these functions, the Designated Governor will receive training in Protection and Prevention.

the Governor adequate. The of the Board of

13   Training

13.1 Designated leaders and deputy leaders, as outlined in this policy, will
     have completed Level 3 Designated Safeguarding Leader training,
     provided by the local authority, which is updated every two years.

13.2 The designated safeguarding officers and the designated governor
     will have completed the recommended safeguarding training
     through the local authority.

13.3 All directors shall receive appropriate safeguarding training
     during their induction and at regular intervals thereafter.
     This training   them
     will provide the necessary knowledge to ensure the   for
     effectiveness of the institution's protection policies and
     procedures.

13.4 All staff, including temporary, bank, agency, and volunteer staff, who
     work with at-risk students or adults must receive appropriate training
     to effectively perform their responsibilities. This training is updated
     annually through refresher courses using online modules covering
     Safeguarding, Prevention, and Online Safety, including expectations,
     roles, and responsibilities related to filtering and monitoring online
     activities to ensure a safe online environment for students. Staff
     completion of the online modules is reported to the Safeguarding
     and Prevention Board semiannually to ensure compliance.

13.5 All staff must receive regular updates to
     through emails, e-newsletters and
     staff meetings to ensure that staff
     be equipped with the latest skills and knowledge
     to protect children effectively.

13.6 All staff must understand the significance of both online and
offline risks.   line, including the
online child abuse (see Annex 5).

13.7 Safeguarding and prevention are addressed in both staff and
student inductions, as well as at other times throughout the
year.

13.8 All higher education staff will complete the preventive training recommended by
the Ministry of the Interior.

14 Confidentiality

14.1 Confidentiality and trust should be maintained to the extent possible, but staff should act with the safety of the person disclosing the information as their top priority. The level of confidentiality will be governed by the need to protect the data subjects. The young person or vulnerable adult should be informed as soon as possible about the disclosure of information.

14.2 The Group complies with current legislation, the General Data Protection Regulation (GDPR) 2018, which allows the disclosure of personal data when necessary to protect the vital interests of a student or adult at risk.

15 Safer recruitment

15.1 Safer recruitment is part of the Recruitment and Selection Policy.

There is also a Disclosure and Exclusion Policy and an Ex-Offender Recruitment Policy.

15.2 In accordance with KCSIE guidelines, the Human Resources Department conducts all pre-employment checks. As part of these checks, online searches are conducted for all new applicants.

employees.

15.3 The Human Resources Department will maintain a single central record of all checks conducted on all staff and volunteers who will be working with anyone within the scope of this policy. KCSIE 2022 clarified that a CV should only be accepted in conjunction with a completed application form and is not sufficient on its own to facilitate more secure recruitment.

16 Communication

16.1 The policy is displayed on the Group's websites, the staff intranet and the virtual learning environment for students and online apprentices.

17   Status of this policy

17.1 The transition policy was approved by Presidential action by the Group Leadership Team in September 2024 and replaces all previous documentation.

17.2 The Executive Director shall periodically review the operation of this policy. The Safety and Security Board may review and amend it from time to time.

17.3 This policy has been assessed in terms of its equality impact to ensure that it does not negatively affect staff, students or others.

Date of approval:	March 2025
Approved by:	Group Leadership Team
Date of implementation:	March 2025
Review date:	March 2030

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Annex 1 - Keeping Children Safe in Education (KCSiE) – Translations

It is everyone's responsibility to keep children safe and to read Part One of the legal guide "Keeping Children Safe in Education."

London Grid for Learning (LGfL) has translated the first part of the KCSiE into several languages:

- Arabic
- Bengali
- Cantonese
- Gujarati
- Mandarin
- Polish
- Portuguese
- Punjabi
- Spanish
- Urdu

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Annex 2 - Definitions

- **Safeguard**It's a broader term than "child protection" and refers to measures taken to promote the well-being of children and young people and protect them from harm. Protection is everyone's responsibility.

- **Children and young people**–Throughout the document, reference is made to "children and young people." These terms are interchangeable and They refer to vulnerable children   18 years old or adults under 25 years of age.

- **Staff**-includes anyone   adult who   this employed, commissioned or contracted to work with children or young people, including volunteers and guest speakers, whethebe of   paid or unpaid form paid.

- **Designated Protection Officers**–a member of the Broader Protection Team trained to Level 3.

- **Duty of care**–the duty placed on an individual or organization to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organization is responsible.

- **External agencies**-including Children's Services, the Independent Safeguarding Authority, the Safeguarding Board, the Board, the Police, etc.

- **External contractors**–including construction or maintenance contractors who are required to work for the Group for a specified period.

- **Vulnerable adult**–someone aged 18 or over who needs or may need community services due to their age, illness, or mental or physical disability, who is or may be unable to care for themselves or unable to protect themselves from significant harm or exploitation.

Appendix 3 - Dō University's approach to addressing sexuality
online sexual harassment and abuse

As a university group (although there may not be significant evidence available), within the culture and values   ofIAt Dō University, online sexual harassment and sexual abuse are not tolerated, and when a problem is identified, early intervention and support are provided to protect individuals and groups within our community.

To achieve this, we will assume that online sexual harassment and sexual abuse occur in our universities, even when there are no specific reports, and we will ensure a University-wide, collaborative approach to addressing them within established safeguarding processes and procedures.

We will work to:

- Minimize potential barriers to reporting and disclosing cases of harassment and sexual misconduct.
- ensure that investigation procedures are fair and independent

- ensure that all students involved receive appropriate support

- Clearly establish behavioral expectations for all students

Our approach to Dō University includes:

- Carefully sequenced content, delivered through the PDP (adapted for Foundation Learning, the full-time 14-16 provision, apprenticeships, and further education), based on Department for Education (DfE) legal guidance, specifically includes sexual harassment and violence, including online. Students will have the opportunity to discuss topics such as consent and sending nudes.

- Provide training and support to staff and host families who provide accommodation to students to increase awareness.

• High-quality training for teachers and student support staff: to raise awareness of signage and support, and to provide confidence in delivery/discussion.

• Sustained use of Safeguard for record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse.

• Report regularly on sexual harassment and sexual violence to the
    Safeguarding and Prevention Board, the Group Leadership Team (GLT),
    and the Corporation annually (with quarterly updates to the Safeguarding
    Governor).

• Through a positive behavioral approach and referral process to reinforce a
    culture where sexual harassment and online sexual abuse are not
    tolerated.

• Work closely with external agencies to raise awareness and increase
    knowledge of the range of support available to children and young
    people who are victims of or perpetrate harmful sexual behavior.

• Provide support and supervision to the team of protection officers.

• Provide updated safeguarding training to ensure all staff (and
    governors, where applicable) can:

> • better understand the definitions of sexual harassment and sexual
>   violence, including online sexual abuse
> • Identify early signs of peer sexual abuse
> • Consistently maintain standards in your responses to online sexual
>   harassment and sexual abuse

Annex 4 – Information on the recognition of abuse

What is negligence?

Neglect is the constant failure to provide a child with basic   the needs
needs and the most common form of child abuse.   childish. A child
They may be left hungry or dirty, or without adequate clothing, shelter,
supervision, or medical care. This can put children and young people at risk. It can
also have long-term effects on their physical and mental well-being.

Signs of abuse

Poor appearance and hygiene

   • be smelly or dirty
   • Being hungry or not having money to eat
   • have unwashed clothes
   • having inappropriate clothing, such as not having warm clothing in winter

Health and development problems

   • anemia
   • Body problems, such as poor muscle tone or prominent joints.

   • medical or dental problems
   • missed medical appointments, such as for vaccinations
   • they were not given the correct medications
   • poor language or social skills
   • common illnesses or infections
   • Repeated accidental injuries, often caused by lack of supervision
   • Skin problems, such as sores, rashes, flea bites, scabies, or ringworm.
   • thin or swollen abdomen
   • fatigue
   • untreated injuries
   • Weight or growth problems.

Housing and family issues

   • Living in an unsuitable home environment, such as no heating.

   • being alone for a long time
   • take on the role of caregiver for other family members.

Changes in behavior

- becoming aggressive
- Being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behavior
- have difficulty concentrating or participating in activities
- small attendance
- Shows signs of self-harm. Uses drugs or alcohol.

What is physical abuse?

Physical abuse occurs when someone intentionally hurts or harms a child or young person. It includes hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting, and scratching. It's important to remember that physical abuse is any form of intentional physical harm to a child or young person. It also includes fabricating symptoms of an illness or making a child feel unwell.

Signs of abuse

Bumps and bruises don't always mean a child is suffering from physical abuse. All children have accidents, trips, and falls. And there's no single sign or symptom to watch for. But it's important

pay attention to the signs.
If a child is injured regularly, there seems to be a pattern in the injuries.

injuries or the explanation does not match the injuries, then this is due

inform.

Symptoms include:
- bruises
- broken or fractured bones
- burns or scalds
- bite marks

It may also include other injuries and health problems, such as:
- scars
- the effects of poisoning, such as vomiting, drowsiness, or seizures
- Respiratory problems due to drowning, suffocation, or poisoning

.

What is sexual abuse?

When a child or young person experiences sexual abuse, they are forced or tricked into participating in sexual activities. They may not understand that what is happening is abuse or that it is wrong. And they may be afraid to tell anyone. Sexual abuse can happen anywhere, both in person and online.

It is never a child's fault that they have been sexually abused: it is important to make sure children know this.

Types of sexual abuse

There are two types of sexual abuse: contact and non-contact. Sexual abuse can occur in person or online.
Contact abuse occurs when an abuser has physical contact with a child.
This includes:

   • sexual contact with any part of a child's body, whether clothed or not

   • using a body part or object to rape or penetrate a child
   • Forcing a child to engage in sexual activities
   • Making a child undress or touch another person

Contact abuse can include groping, kissing, and oral sex; sexual abuse is not limited to penetrative sex.

Non-contact abuse occurs when a child is abused without the abuser actually touching them. This can occur in person or online and includes:

   • expose or flash
   • showing pornography
   • exposing a child to sexual acts
   • Making them masturbate
   • Forcing a child to make, view, or share child abuse images or videos
   • making, viewing, or distributing images or videos of child abuse
   • Forcing a child to participate in activities or conversations
       sexual online or via a smartphone

.

Emotional and behavioral signs:

• Avoid being alone or being afraid of people or someone they know.
• Sexual language or behavior you wouldn't expect them to be familiar with.
• Having nightmares or wetting the bed.
• Alcohol or drug abuse.
• Self-harm.
• Changes in eating habits or development of an eating disorder.
• Changes in your mood, feeling irritable and angry, or
    anything out of the ordinary.

Physical signs:

• Bruises.
• Bleeding, discharge, pain, or tenderness in the genital or anal area.
• Sexually transmitted infections.
• Pregnancy.

What is emotional abuse?

Emotional abuse is any type of abuse that involves the ongoing emotional mistreatment of a child or young person. It is sometimes referred to as psychological abuse. Emotional abuse may involve deliberately trying to frighten, humiliate, isolate, or ignore a child or young person.

Emotional abuse is often part of other types of abuse, which

It means that it may be difficult to spot the signs or notice the difference,

although it can also happen on its own.

Types of emotional abuse include:

• Constantly humiliating or criticizing the child
• Threatening behavior, including yelling
• Use sarcasm or make the child the subject of jokes
• Blame the child for situations
• Forcing a child to perform degrading acts
• Pushing a child or trying to control his or her life
• Exposing a child to events or situations such as abuse
    domestic or drug use.
• Not allowing a child to have friends
• Not promoting the child's social development
• Forcing a child to perform degrading acts

                        .

- Persistently ignoring a child
- Be absent
- Manipulating a child
- Being constantly negative about the child
- Never show any emotion to a child

Signs of emotional abuse

In the case of emotional abuse, there may be no obvious physical signs, and the child may not tell anyone what is happening until it reaches a critical point. Therefore, it is important to observe how the child acts and behaves. Signs may include:

- Insecure or lacking self-confidence
- Struggling to control their emotions
- Having difficulty maintaining relationships
- Acting in a manner inappropriate for his or her age.
- Use of appropriate language
- Being isolated from their parents
- Lack of social skills
- I have few or no friends

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Annex 5 – Recognition of technology in safeguarding

Technology plays a pivotal role in many aspects of safety and well-being. KCSIE 2024 highlights several critical points:

• Dual risks: Children face risks both online and offline, and these risks often occur simultaneously. Staff must be vigilant in recognizing and addressing these dual threats.

• Online child abuse: The document identifies growing concern about online child abuse. This abuse can manifest itself in a variety of ways, including:

   i. Abusive, harassing and misogynistic messages.
  ii. Sharing indecent images without consent,

   especially within chat groups.
 iii. Sharing abusive images and pornography

   with people who do not wish to receive such content.

Resources:

Each school has its own online group page that provides information for our students, apprentices, and vulnerable adults, including links and signposts for internal and external support.

Support, advice and guidance are available on the Intranet of the

staff.

Remember that protection is everyone's responsibility.

If you have any concerns or are unsure, you can speak to someone from your University's Safeguarding Team.

Make sure you have completed your online module on safeguarding and prevention, which will include reading Keeping Children Safe in Education, Part 1, which applies to all staff.