



Safeguarding and Prevent Policy (including Child Protection)

16th September 2024

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| 2 | 11/9/23 | Revised to reflect KCSIE 2023 amendments. Further guidance on staff communication with students. | C Whitmore |
| 3 | 23/11/23 | Revised to reflect KCSIE 2023 low-level concerns procedure | C Whitmore |
| 4 | 18/1/24 | Vulnerable adults to adults at risk. Addition of NHS definition of adults at risk. | C Whitmore |
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Document Reviewers

| Name | Role | Policy Responsibility |
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Relevant Documents

| Policy |
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| <p>Related CEG team member policies can be found at the CEG Help Centre including:</p> <ul style="list-style-type: none"> • CEG Health and Safety Policies • CEG Disciplinary Policy • CEG Equality & Diversity Policy • CEG Dignity at Work Policy • CEG Domestic Abuse Guidelines • CEG Whistleblowing Policy • CEG Privacy Policy https://www.cambridgeeducationgroup.com/privacy-policy/ • OnCampus Attendance Policy • CEG Student Sexual Misconduct Policy and Procedure • OnCampus Missing Student Policy |
| Legislation and Government Guidance |
| KSCIE 2024: https://www.gov.uk/government/publications/keeping-children-safe-in-education--2 |

Working together to safeguard children - GOV.UK (www.gov.uk) Statutory guidance
What to do if you're worried a child is being abused:
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

| Approved by: | Signature | Date |
|--------------|-----------|------------|
| Mike Goodwin | M Goodwin | 16/09/2024 |
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1. Introduction

This policy is central to meeting safeguarding responsibilities to our students. This includes all students regardless of age. Most of our students are living independently abroad and each is likely to require some level of support at different times while they study with us. As part of our safeguarding commitment, we actively seek to promote the welfare of all students.

CEG has a duty to take reasonable and necessary steps to ensure that children and adults at risk are safe and that reasonably foreseeable harm does not occur as a result of careless acts, deliberate acts or omissions by CEG. Safeguarding also encompasses the statutory duties of child protection, and the protection of children and adults at risk from being susceptible to being drawn into terrorism. Students aged under-18 and adults at risk could be studying with, or working for, CEG.

1.1 Scope

This policy, and its associated procedures, has been drawn up on the basis of UK legislation, policy and guidance to protect children and adults at risk; it is applied, in whole or in part, to all CEG centres taking into account local legislation which may substitute where applicable UK law.

It is the responsibility of all employees to safeguard students. This policy applies to anyone working on behalf of CEG, including the Executive Board, paid hourly and salaried employees, volunteers, agency workers, consultants, or contractors and currently enrolled students. In addition, CEG recognises that it may have employees or students on work experience who are either aged under 18 or who would fall within the definition of an adult at risk. Their safety is equally as important and therefore this policy extends coverage to both groups. The policy applies to all activities involving contact with children or adults who may be at risk. The policy includes face to face activities and activities delivered online. These measures are in addition to those required under general health and safety requirements and legislation.

1.2 Definitions

Safeguarding: protecting children and adults at risk from maltreatment, exploitation, harm, neglect or abuse. This can include protection from physical, sexual, or psychological harm. It also includes promoting the welfare of children, which includes providing help and support to meet the needs of children as soon as problems emerge and protecting children from maltreatment, whether that is within or outside the home, including online. Safeguarding is also the protection of children and adults at risk from involvement with crime and/or terrorism.

CEG responsibilities to all students and staff comply with statutory requirements, advice and guidance, including:

- The Children Act 1989 <https://www.legislation.gov.uk/ukpga/1989/41/contents>
- The Children Act 2004 <https://www.legislation.gov.uk/ukpga/2004/31/contents>
- Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- The Education Act 2002 <https://www.legislation.gov.uk/id/ukpga/2002/32> which states that teachers, education professionals, social workers, health professionals, police officers and members of the public have a statutory duty to report any concerns or suspicions that a child has been abused
- Safeguarding and Vulnerable Groups Act 2006
- The Education Act 2011 <https://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>
- The Sexual Offences Act 2003 <https://www.legislation.gov.uk/ukpga/2003/42/contents>
- [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115444/keeping-children-safe-in-education-2024.pdf)

- Working Together to Safeguard Children
<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>
- Protections of Freedoms Act 2012
- Counter Terrorism and Security Act 2015
<https://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>
- The Care Act 2014
- Protecting Vulnerable Adults 2017, revised January 2023
- Equality Act 2010
- What to do if you're worried a child is being abused - Advice for Practitioners (March 2015)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Child: is any person under the age of 18. The fact that a child has reached 16 or 17 years of age, is living independently or is in Further/Higher Education does not change their status for the purpose of this policy and procedure. The Children Act 1989 requires the safety or welfare of the child or young person to be of paramount importance; it overrides all other considerations.

As per the process set out in our Admissions Policy, CEG will require the student's parent/guardian to sign a Consent Form confirming that they have understood that CEG is not in loco parentis. CEG does not and cannot accept the responsibilities of guardian to any member of its community. In the case of a Looked After child, appropriate contact will be made with their Local authority, including with their Social Worker.

Allegation that may meet the harm threshold: The term 'allegation' means it is alleged that an adult who works with under 18s has:

- behaved in a way that has harmed an under 18, or may have harmed an under 18; and/or
- possibly committed a criminal offence against or related to an under 18; and/or
- behaved towards an under 18 in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with under 18s.

In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children.

Concern (including an allegation) that does not meet the harm threshold i.e. a low-level concern:

- The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour towards an under 18 does not meet the harm threshold set out above.
- A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult may have acted in a way that:
 - is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
 - does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, on a no-names basis if necessary

Adult at Risk of Harm: Safeguarding adults at risk is defined in the care and support statutory guidance issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse, neglect and exploitation;
- people and organisations working together to prevent and stop both the risks and experience of abuse, neglect or exploitation;
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action;
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.

Section 42 of The Care Act 2014 defines an adult at risk of harm as a person over the age of 18 who: (i) has needs for care and support; (ii) is experiencing, or is at risk of, abuse or neglect; and (iii) as a result of those needs is unable to protect themselves against abuse or neglect or the risk of it. It is recognised that there will have to be a judgement made to determine whether or not to treat someone as an adult at risk at any specific time. It is important that if the definition is not met that information about that person should not be shared without consent except in extreme situations or where not to do so would place someone else at risk.

Individuals may only temporarily meet the definition of 'adult at risk' if this is caused by external factors and in such cases, CEG works with external organisations to ensure appropriate support is in place where responsibility for providing such support lies with those organisations.

Prevent: part of the UK government anti-terrorism programme which aims to safeguard vulnerable People from being susceptible to being drawn into terrorism. When considering the statutory requirements of the Prevent Duty, there is no standard definition of a person likely to be vulnerable to radicalisation.

1.3 Aims

The main aims of this policy are:

- 1.3.1 to promote and prioritise the safety, protection and welfare of children and adults at risk
- 1.3.2 to provide assurance to parents, guardians and other parties that CEG takes reasonable steps to manage risks and keep children and adults at risk safe
- 1.3.3 to ensure that all employees and students understand their roles and responsibilities in respect of safeguarding and Prevent. This includes all employees, agency tutors, volunteers, contractors and consultants
- 1.3.4 to provide CEG employees with relevant information, training and support in order to make informed responses to child protection and Prevent issues
- 1.3.5 to enable the early identification and prompt and appropriate management of allegations and low-level concerns
- 1.3.6 to ensure that CEG practises safe recruitment procedures, including background checks for work with children and adults at risk. This should be read in conjunction with the CEG Recruitment Policy which can be found in the Help Centre
- 1.3.7 to provide robust systems and procedures that are followed by all employees in the event of any allegations or suspected abuse, whether the harm has taken place on CEG premises or not
- 1.3.8 to know that accessible support services are available for students and staff.

2. Roles and Responsibilities

2.1 Safeguarding is everyone's responsibility. All CEG employees are in a position of trust, particularly those OnCampus employees who teach, support, guide or in any way interact with students in regular unsupervised situations. Employees, students and volunteers working with children and adults at risk within CEG must be familiar with this policy. They must also conduct themselves in accordance with CEG policies (found in the Help Centre).

2.2 All CEG employees are required to confirm they have read this policy in its entirety. OnCampus employees who are in direct contact with students must also confirm that they have read Part 1 of the current Keeping Children Safe in Education guidance and Annex B; employees who do not work directly with children must confirm that they have read Annex A of the current Keeping Children Safe in Education guidance.

2.3 To enable employees to meet their responsibilities, CEG will:

- 2.3.1 make all employees aware of their safeguarding responsibilities during induction and provide appropriate training
- 2.3.2 help all employees (and students) to understand what acceptable behaviour is, to be vigilant of possible safeguarding issues, how they can stay safe from harm and how to raise concerns
- 2.3.3 develop an ethos in which an employee feels confident about discussing with the appropriate Safeguarding Lead any concerns about a child, adult at risk or a colleague's behaviour
- 2.3.4 ensure that all stakeholders have access to this policy online
- 2.3.5 provide and maintain sites that are safe and secure places to study and work.

2.4 In accordance with the law all staff, contractors and volunteers are reminded of the offence of abuse of positions of trust under the Sexual Offences Act 2003 s.16-19, which makes it an offence for a person aged 18 or over intentionally to behave in certain sexual ways in relation to a child (aged under 18), where the person (aged 18 or over) is in a position of trust. This is defined as looking after a child (aged under 18) who is receiving education at an educational institution, and a person (aged 18 or over) who is not receiving education at that institution.

2.5 CEG has the following designated roles with safeguarding and Prevent responsibilities:

- 2.5.1 Executive Team: carry overall responsibility for all safeguarding and Prevent matters within CEG. All employees are expected to know and understand their safeguarding responsibilities
- 2.5.2 Executive Sponsor
- 2.5.3 Safeguarding and Prevent Sponsor
- 2.5.4 OnCampus Centre Directors, CEO (Unihaven, Castel), Director of Operations (Digital), Director of Academic Studies (iheed)
- 2.5.5 Heads of Department/Directors
- 2.5.6 Designated Safeguarding Leads
- 2.5.7 Deputy Designated Safeguarding Leads.

Details of the safeguarding roles and responsibilities can be found in Appendix 8. The key contacts information for each department/centre will be provided for employees, student, volunteers, agency workers, consultants or contractors and visitors.

2.6 Student Representatives: some students have positions of authority in relation to other students, for example Student Representatives. These students should be aware that they may be in contact with students who are under-18 and/or adults at risk. They must be aware of this policy and act

appropriately at all times.

2.7 External Guardianship Providers are appointed by OnCampus for all students who are under the age of 18 years old. The guardian team have responsibility to:

- be available by emergency phone 24 hours a day
- act on behalf of the parent/guardian in the case of emergency.

3. Training and Induction

3.1 All employees will receive safeguarding training, including Prevent, as part of their induction training programme appropriate to their role.

3.2 All employees are required to confirm that they have read this policy, procedure and related guidance

3.3 Staff will undertake appropriate internal safeguarding training on a regular basis

3.4 Staff with responsibility for Safeguarding and Prevent (for example Centre Director, DSL, Deputy DSL) will undertake higher level safeguarding and Prevent training in accordance with good practice requirements.

4. Handling a Disclosure, allegation and low-level concern

4.1 CEG procedures are based on the NSPCC guidance *What to do if a child reveals abuse* <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/what-to-do-child-reveals-abuse/>

4.2 All employees, students, volunteers, contractors and consultants are expected to handle a disclosure in accordance with the guidance in Appendix 3.

4.3 If a child or an adult at risk reveals abuse, employees must record and report any concerns to the appropriate safeguarding lead without delay (Appendices 4-6). The ***Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully to keep the information they hold safe and secure. However, they do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.***

If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. Point 55, KCSIE 2024

4.5 All employees, students, volunteers, contractors and consultants are expected to handle a low-level concern in accordance with the guidance in Appendix 2.

4.6 Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the appropriate safeguarding lead.

4.4 Refer to Appendix 5 for guidance procedures on managing allegations against CEG employees.

4.6 Allegations involving a student: allegations involving a student and a person under-18 or an adult at risk should be reported to the Designated Safeguarding Lead. Consideration will be given as to

whether the situation constitutes a child protection/adult at risk issue and appropriate actions taken.

4.7 Whistleblowing: is an important aspect of a safeguarding institution. Employees should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime. Please refer to the CEG Whistleblowing Policy in the Help Centre for further details. General guidance on whistleblowing can be found via: <https://www.gov.uk/whistleblowing>. The NSPCC's 'what you can do to report abuse' dedicated helpline is available as an alternative route for a team member who does not feel able to raise concerns regarding child protection failures internally, or has concerns about the way a concern is being handled by their place of work. <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/> Staff can call 0800 028 0285 – the line is available from 8:00 AM to 8:00 PM, Monday to Friday, 9:00 AM to 06:00 PM at the weekend. Email: help@nspcc.org.uk

4.8 Procedure for Dealing with Concerns of Possible Abuse Outside CEG:

4.8.1 As a result of their contact with an under-18 or adult at risk, an employee or student may become concerned about the welfare of the under-18 or adult at risk and may be concerned that abuse is being perpetrated by someone unconnected with CEG. In these circumstances the individual should report their concerns to the Designated Safeguarding Lead.

4.8.2 If a student or employee is concerned that abuse is being perpetrated by a student against someone unconnected with CEG, the individual should report their concerns to the Designated Safeguarding Lead who will take appropriate action as previously outlined.

4.8.3 If an employee or student is concerned that abuse is being perpetrated by a CEG employee against someone unconnected with CEG, the individual should report their concerns to the line manager (central teams) or Centre Director who will take appropriate action as previously outlined.

4.9 Confidentiality: while an allegation is being investigated, every effort should be made to maintain confidentiality and guard against publicity. Apart from keeping the child, parents and accused person, where applicable, up to date with progress of the case, information should be restricted to those who have a need to know in order to protect the children or adults involved, facilitate enquiries and manage the investigation. The same approach applies in the case of an adult at risk.

5. Multi-Agency Work

5.1 CEG will work with the appropriate agencies, where they are involved, to provide appropriate support for the child, adult at risk, employee. This could include Children's or Adult Social Services, and/or Police and partner university safeguarding teams.

5.2 UK only: the online tool [Report child abuse to a local council - GOV.UK \(www.gov.uk\)](https://www.gov.uk/report-child-abuse-to-a-local-council) which directs to the relevant local authority children's social care contact number. If an adult is being abused, or deemed to be at risk of abuse, contact the local council [Find your local council - GOV.UK \(www.gov.uk\)](https://www.gov.uk/find-your-local-council)

6. Safe Recruitment of Employees

6.1 This includes all employees, agency tutors, volunteers, contractors and consultants

6.2 As part of its recruitment policy CEG will ensure Safer Recruitment practice is followed. An enhanced DBS with barred list will be undertaken for everyone in OnCampus centres, Academic Team, Livein Team. Basic criminal record checks will be carried out for non centre-based employees.

6.3 Where contractors or consultants are used, checks are made to ensure that the staff have been subject to the appropriate level of DBS check, and that adequate supervision is in place whilst on the premises.

7. Student Welfare

7.1 Safeguarding training will inform appropriate staff of the potential for student welfare issues and how to raise concerns, including verbally, by email or EBS (Ontrack). All concerns should be raised in a timely manner, ideally before the end of the same working day and in accordance with the Reporting Process (Appendix 4).

7.2 Concerns would include the following:

- Bullying and harassment, including sexual misconduct
- Peer on Peer abuse: if peer on peer abuse is identified, a referral will be made by the Designated Safeguarding Lead to the appropriate external agency
- Female Genital Mutilation (FGM): if an employee in the course of their work, discovers that an act of FGM appears to have been carried out on a girl when she was under the age of 18, then this must be reported this to the Police as part of their statutory duty
- Neglect
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation: County Lines (CCE)
- Children with unexplainable and/or persistent absences from education
- Domestic abuse and/or violence
- Homelessness
- Honour-based violence
- Forced marriage. Age of consent for marriage in the UK is 18.
- Online safety

See Appendix 1 for further detail.

7.3 Unexplainable and/or persistent absences from education

Attendance is recorded for all students. The whereabouts of all students under 18 and those adult students considered to be at risk will be monitored and recorded. In the event that a student cannot be located, then steps must be undertaken to make contact with the student in line with the OnCampus Attendance Policy, Missing Student Policy and CEG Emergency procedures. This may include contact with the External Guardianship Provider, parents, agents, accommodation provider and Police as appropriate.

7.4 Homelessness: OnCampus expects all students under 18 to live in residences approved by our accommodation team. In exceptional circumstances permission may be given for students to live in another residence. Some adult students choose to live in private accommodation. In the event that a current student becomes homeless, then support is available to them via their centre.

8. Prevent Duty: deals with the issue of potential radicalisation and extremism. It applies to all CEG staff.

8.1 All staff members receive Prevent Duty Training from induction onwards.

8.2 Prevent education for students is part of their induction and tutorial programme.

8.3 The CEG Prevent Lead is the Safeguarding and Prevent Sponsor.

8.4 In all centres, the local Prevent Lead will be the home centre Designated Safeguarding Lead.

8.5 For UK centres, the contact details for the regional higher education Prevent co-ordinator will be shared with staff.

8.6 Referral of concern regarding radicalisation of a student:

8.6.1 Where a team member has concerns that a student is expressing violent extremist views or is at risk of being drawn into violent extremism, these concerns should be reported immediately to the Designated Safeguarding Lead using the Prevent Concern form (see Appendix 6 for required content).

8.6.2 The Designated Safeguarding Lead will investigate the matter and discuss with their line manager to assess the seriousness of the case.

8.6.3 If appropriate a referral will be made to the appropriate local authority eg Prevent Team. A written record must be kept of the concerns, discussions and decisions made, including the rationale for those decisions.

8.6.4 The outcome will be shared with the Safeguarding and Prevent Sponsor.

8.7 Concern about staff: this should be reported to the Centre Director (OnCampus centres) or Director of Operations (Digital) or Director of Academic Affairs (iheed), and the Safeguarding and Prevent Sponsor (central team) or People Team in their absence. Further advice will be sought from the local Channel team and discussion of case with the relevant local authority lead (eg LADO in the UK).

9. Online Conduct

9.1 During student induction and tutorials students are taught about the safe use of the internet, the appropriate use of social media, how to safely publish content online and cybercrime.

9.2 Employees should refer to the IT Policy for further information regarding appropriate use of the internet on CEG devices.

9.3 If you are concerned about online maltreatment or sexual abuse, report this to the Designated Safeguarding Lead; if you believe a child/adult is at immediate risk this must be reported immediately to the police authorities. In the UK, a report can be made to CEOP (Child Exploitation and Online Protection Command) www.ceop.police.uk. If a report is made, inform your Designated Safeguarding Lead immediately after this.

10. Communication with students

10.1 All communication with students must be through CEG designated platforms (eg outlook, Teams, Canvas, WhatsApp on a company phone).

10.2 CEG employee must not use personal mobile phones or email accounts to communicate with students. This includes the taking of photographs.

10.3 Employees must not 'follow' or 'friend' students on social media sites.

10.4 While a student remains under our license, until the end date for ICAS students or a student remains on one of our courses **staff must never:**

- give students their personal mobile phone number
- communicate with students by text message, Whatsapp etc on a personal phone
- give personal email addresses to students
- communicate with students on personal social media sites (eg LinkedIn)
- use a personal device to take photos/videos of students.

10.4 All electronic communication with students must happen on company devices (company laptop or mobile phone), never on a personal device.

10.5 Students must be informed of the purpose of taking still or moving photographs of them and how these photographs will be used. Student consent must be requested at the time.

10.6 For Under 18s, parental consent is a required part of the admissions process.

10.7 Students should be suitably dressed in photographs.

10.8 If you have a concern about photographs being taken of a student, please contact your named Designated Safeguarding Lead.

11. Safety on Site

11.1 All visitors to a CEG centre are required to sign in on arrival. During the signing in process, they will be given information about how they should report any safeguarding, child protection and Prevent concerns. Appendix 8 outlines the procedures to manage visitors.

11.2 Staff are trained to raise any concern about a visitor with the Centre Director (or equivalent) immediately.

11.3 Checks of identity will be carried out annually onsite, for this visitors or contractor will need to provide defined documentation.

11.4 Accident Reporting involving children or adult at risk: any accident on CEG premises involving a child or adult at risk must be reported to the Health and Safety Team immediately and formally recorded on the accident reporting system as soon as possible.

11.5 Where a low-level concern is reported and relates to a person employed by a contractor, CEG will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified. Refer to Appendix 2.

11.6 For further information specific to contractor management, please refer to the CEG management of contractor's policy.

12. Disclosure of Information Request/Data Subject Access Request

Requests for disclosure of information can be and are received by Cambridge Education Group these requests could be verbal, written or a formal document. The disclosure of any personal information is bound by specific rules and must be handled correctly. The Data Protection team holds guidance on how and when this information can be shared and will work with the relevant parties to ensure that the verification, legitimacy, and accuracy of the request is determined. If you receive a request for disclosure of information, please immediately contact dpo@ceg-uk.com where the Data Protection team will be able to offer assistance and guidance.

Please note: Requests for information that are deemed vital to that of a life or death situation should be handled as an emergency, and do not fall within the normal category of disclosure requests as described above. Please refer to Appendix 4, Handling a Disclosure: Reporting Process.

Appendix 1 Forms of abuse or harm that may be experienced by a child or adult at risk

Abuse is a violation of an individual's human and civil rights by any other person or persons and may result in significant harm to, or exploitation of, the person subjected to the abuse. This includes maltreatment, inside or outside the home, including online.

It is important to note that abuse can:

- Consist of a single act or repeated acts;
- Be intentional or unintentional or result from a lack of knowledge;
- Be an act of neglect, an omission or a failure to act;
- Cause harm temporarily or over a period of time;
- Occur in any relationship;
- Be perpetrated by anyone, individually or as part of a group or organisation;
- Often constitute a crime, i.e. physical, sexual abuse, e.g. downloading or using pornographic images of children and/or storing them on CEG or University computers or equipment.

Adults at risk: The NHS outlines seven categories of abuse of adults at risk. Abuse may comprise a single act or repeated acts:

- **Physical:** the physical hurting or injuring of an adult at risk, including denying them food, water, or assistance going to the bathroom if needed, and the misuse of their medicines.
- **Psychological:** the persistent emotional maltreatment of an adult at risk which results in severe or persistent adverse effects. This includes unreasonable and unjustifiable withdrawal of services or support networks.
- **Sexual:** the forcing or pressuring of an adult at risk to take part in sexual activities. The activities may involve physical contact, including assault by penetration or nonpenetrative acts. They may also include non-contact activities such as involving looking at, or in the production of, pornographic material.
- **Domestic:** a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, typically by someone who is or has been an intimate partner or family member.
- **Discriminatory:** harassment, slurs or unfair treatment relating to an adult at risk's race, gender and gender identity, age, disability, sexual orientation, or religion.
- **Financial abuse:** stealing money or valuables. This can include the inappropriate use of an adult at risk's money by a person appointed to look after it, or coercing an adult at risk to spend their money in a way they are not happy with.
- **Neglect:** the persistent failure to meet an adult at risk's basic needs, likely to result in the serious impairment of the adult's health or development. Neglect can include failure to provide the following: adequate food, clothing and shelter; protection from physical and emotional harm or danger; adequate supervision; access to appropriate medical care or treatment.

Abuse of Children or Young Adults

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

Reference: Keeping Children Safe in Education September 2024

https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf

Please note this is not an exhaustive list, please refer to Keeping Children Safe in Education

The following may indicate that abuse is taking place (this list is not exhaustive. Refer to NSPCC Child

Protection fact sheet for further information (<https://learning.nspcc.org.uk/research-resources/briefings/definitions-signs-child-abuse>)

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- An injury for which the child, adult's or carer's explanation appears inconsistent;
- The child or adult describes an abusive act or situation;
- Unexplained changes in behaviour; for example becoming withdrawn, aggressive behaviour or severe temper outbursts. Neurotic behaviour, for example hair twisting, rocking.
- The display of inappropriate behaviour (sexual or otherwise);
- Apparent mistrust of others;
- Being secretive about what they are doing, including online;
- Changes in attendance patterns
- Absence from education, particularly on repeat occasions and/or prolonged periods
- Withdrawal from extra-curricular/social activities;
- Decline in academic performance;
- Criminal activity;
- Substance or drug misuse;
- Mental health difficulties including depression;
- Self-harm or mutilation, sometimes leading to suicide attempts;
- The child or adult appears increasingly unkempt;
- Loss of weight or being constantly underweight.

In accordance with KCSIE 2024, help and support to meet the needs of children should be given as soon as problems emerge. The following list is an example of the types of abuse or harm children or adults may encounter (this list is not exhaustive). Further detail is found in KCSIE September 2024.

Physical abuse or violence, including hitting, shaking, throwing, slapping, pushing, kicking, poisoning or the giving or supply of illegal drugs, misuse of medication, burning, scalding, drowning, suffocating, restraint or otherwise causing physical harm, or inappropriate sanctions.

Sexual abuse, including grooming, rape and sexual assault of, or sexual acts with, a child or adult at risk, or an adult who has not consented or could not consent or was pressured into consenting; the activities may be physical or non-physical for example involving children or adults in looking at, or in the production of, sexual images. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect, the persistent failure to meet a child's basic physical and/or psychological needs.

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

Financial abuse, including theft, fraud, exploitation, or the misuse or misappropriation of property, possessions or benefits.

Physical or emotional neglect and acts of omission, including ignoring or neglect of emotional, medical or physical care needs, failure to protect a child or adult from physical or emotional danger or to ensure adequate supervision, failure to provide access to social care health, or educational services, the withholding of necessities such as medication, adequate nutrition and heating, and benefits.

Discriminatory abuse, including racist, sexist, ageist abuse or abuse based on a person's disability, and other forms of harassment, slurs or similar treatment.

Internet/electronic abuse, the use of communication technologies (e.g. internet, text or video messaging, email, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Domestic Abuse, can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

So-called 'honour'-based abuse such as:

Forced marriage, a marriage in which one or both partners do not consent to the marriage and are coerced into it. Coercion can be physical, emotional or financial. It also applies to an adult who may not have the capacity to consent to the marriage. People who are forced to marry, or are at risk of so-called 'honour'-based abuse and might be forced to marry, can have unexplainable and/or persistent absences from education. Marriage under the age of 18 is illegal in the Netherlands, UK and Ireland. In France, under the Civil Code 2013 the minimum legal age of marriage is 18. However, marriage before the age of 18 is possible with parental and judicial approval.

Female Genital Mutilation (FGM) is illegal in the UK, EU and Ireland. Cases of where FGM is reported to have taken place or concerns that it might take place must be treated as a safeguarding issue. If a team member in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, then this **must be reported to the police** as part of their statutory duty. It should be recognised that FGM can occur at any time, for example on reaching adulthood.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. Individuals may express extremist ideas, be in possession of extremist literature or express extremist views. They may associate with known extremists or seek to recruit others to an extremist ideology. Concerns that an individual's behaviour indicates involvement with extremist ideas should be considered a safeguarding issue and reported as such to your Designated Safeguarding Lead.

Bullying

There is no legal definition of bullying. However, it is usually defined as behaviour that is:

- repeated
- intended to hurt someone either physically or emotionally
- often aimed at certain groups, eg because of race, religion, gender or sexual orientation.

Some forms of bullying are illegal and should be reported via the Designated Safeguarding Lead to the Police. These include:

- Violence or assault
- Theft
- Repeated harassment, including sexual harassment, or intimidation eg name calling, threats and abusive phone calls, emails or text messages

- Hate crimes

Child Sexual Exploitation is a form of sexual abuse where young people are exploited for money, power or status. It can occur directly or through the use of technology. Young people may be groomed online through social media sites and apps including dating apps.

Possible indicators may include:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from class;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours;
- Self-harm or significant changes in emotional well-being.

Indicators are a guide and do not replace, but should assist, the exercise of professional judgement.

The person who is making the judgements needs to take into account the principles detailed above and be clear on the evidence that the risk is actually occurring or whether further assessment is required to clarify this. The earlier the intervention the better chances of success.

Important points to remember – Child Sexual Exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- Can still be abuse even if the sexual activity appears consensual;
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- Can take place in person or via technology, or a combination of both;
- Can involve force and/or enticementbased methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- May occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- May be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse;
- Is typified by some form of power imbalance in favour of those perpetrating the abuse;
- Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources;
- The coercers and perpetrators are usually an adult, but can be children and young people in a position of power of either gender;
- Young people may exchange or sell sex as a result of constrained choices such as poverty, isolation and historic abuse;

- Parents/guardians may be involved in the sexual exploitation of their children, or fail to prevent/protect from it;
- Groups of children and young people and multiple perpetrators may be involved (organised abuse);
- Children and young people with additional needs require special consideration up to the age of 25 years.

Serious Violence, including Child Criminal Exploitation (CCE): County lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the appropriate national referral mechanism should be considered.

County Lines - National Crime Agency (UK)

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any adult at risk over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults;
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

SEXUAL VIOLENCE AND SEXUAL HARASSMENT

If dealing with any report of sexual misconduct or harassment, refer to the CEG Student Sexual Misconduct Policy and Procedure 2024.

Sexual violence and sexual harassment can occur between two people of any age and sex, including children and adults at risk. It can also occur through a group of people, including children, or adults at risk, sexually assaulting or sexually harassing a single person (child) or group of people (children).

People who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. In the case of children and adults at risk this will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Employees should be aware that some groups are potentially more at risk. Evidence shows females, those with SEND and LGBTQ+ adults at risk and children are at greater risk.

Employees should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;

- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras;
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. It is a criminal offence. Anyone of any sex, can be a victim;
- Dismissing or tolerating such behaviours risks normalising them.

It is important that all employees are aware of sexual violence and the fact that students, including children and adults at risk, can and sometimes do, abuse their peers in this way.

Child-on-child abuse:

Children can abuse other children (often referred to as child-on-child abuse), and this can happen both inside and outside their place of study and/or the home, and online. Staff have an important role to play in preventing this and responding where they believe a child may be at risk from it. Even if there are no reports in their centre it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they must speak to their designated safeguarding lead (or a deputy).

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Modern Slavery and the National Referral Mechanism (England and Wales)

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that

someone may be a victim of modern slavery, the support available to victims and how to refer is found here: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

APPENDIX 2 CEG Safeguarding and Prevent Policy

Low-level Concerns Procedure:

1. Introduction

The Low-level Concerns Procedure offers guidance for staff if they feel they need to share something that is worrying them about another member of staff who works in or on behalf of CEG, but that may not necessarily be regarded as a serious allegation or safeguarding matter. This would be described as a low-level concern.

This procedure provides guidance as to what a low-level concern is; with whom and how to pass on that concern; and information for staff should a low-level concern be raised about them.

The procedure seeks to:

- encourage an open and transparent culture
- empower staff to share any low-level concerns or self-refer
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised
- enable CEG to identify concerning, problematic or inappropriate behaviour at an early stage
- minimise the risk of abuse
- help to identify any weaknesses in the CEG safeguarding system; and
- ensure that adults working in or on behalf of CEG are clear about professional boundaries, and act within these boundaries and in accordance with the values of CEG.

This procedure operates in conjunction with Part 4 of Keeping Children Safe in Education (KCSIE 2023) and the following:

- CEG Safeguarding and Prevent Policy, including Child Protection
- CEG Disciplinary Policy
- CEG Dignity at Work Policy
- CEG Whistleblowing Policy
- CEG Privacy Policy
- Acceptable Use of Assets Policy

2. What is a Low-level concern?

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a “nagging doubt” – that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO (KCSIE 2024)

A low-level concern may just be something that sits slightly uncomfortably about a member of staff. Or it may be that there is something you feel a member of staff needs some support and training with, in order to prevent them being in a position that could breach our Safeguarding and Prevent Policy (including child protection).

Examples of such behaviour could include, but are not limited to:

- Being overfriendly with a student
- Having favourites or students developing high-dependency relationships with them
- Taking photographs of students on a personal device

- Using a personal laptop for work
- Engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- A breach of trust or boundaries.

Concerns may also arise through, for example: a complaint; suspicion; as a result of vetting checks; a disclosure made by a student or an adult within or outside the organisation.

The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour does not meet the harm threshold set out in section 3.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is serious enough to consider a referral to the Local Authority Designated Officer (LADO), or meets the threshold of an allegation. Once staff share with their Centre Director (or the CEG Designated Safeguarding Lead (DSL) in the case of central staff), what they believe to be a low-level concern, that determination should be made by the person leading the response (Investigating Officer, see section 5).

3. What is the harm threshold?

An allegation that may meet **the harm threshold** refers to an allegation that a person has:

- behaved in a way that has harmed an under 18, or may have harmed an under 18; and/or
- possibly committed a criminal offence against or related to an under 18; and/or
- behaved towards an under 18 in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with under 18s.

In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children.

4. Who does this process apply to?

The process applies to all staff whether working in or on behalf of CEG, engaged as a paid employee (including agency staff), worker or contractor, or unpaid member of staff or volunteer.

Low-level concerns which are shared about agency staff, contractors and visiting staff should be reported to their employers, so that any potential patterns of inappropriate behaviour can be identified. If in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

5. Who should staff share low-level concerns with?

Low-level concerns about an employee should be shared with the Centre Director (OnCampus centre); CEO (Unihaven, Castel); the Director of Operations (Digital); the Director of Academic Programmes (iheed). There is one recipient, so that patterns of potential inappropriate, problematic or concerning behaviour can be identified and to ensure no information is possibly lost.

A low-level concern relating to the behaviour of the Centre Director, CEO (Unihaven, Castel), Digital Director of Operations or Director of Academic Programmes (iheed) should be referred to the CEG DSL.

Low-level concerns about a non centre-based employee should be shared with the CEG DSL.

If there is a conflict of interest in sharing a low-level concern with the CEG DSL, the low-level concern should be reported to the Group Chief Operating Officer, unless there is conflict of interest in doing so, in which case it should be reported directly to the People Director.

In all cases, the low-level concern should be shared as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a specific incident). Although it should be emphasised that it is never too late to share a low-level concern.

Please note that 'Investigating Officer' refers to the member of staff leading the response.

Please refer to Appendix 5 of the CEG Safeguarding and Prevent Policy (including Child Protection), for further guidance.

6. What if I'm not sure if my concern classes as something worthy of reporting?

The concern should still be shared as per section 11. The Centre Director, CEO (Unihaven, Castel), Digital Director of Operations or Director of Academic Programmes (iheed) or CEG DSL will make the professional judgement as to what is necessary to record for safeguarding purposes.

7. Should staff share concerns about themselves (i.e. self-report)?

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the requirement set out in the Safeguarding and Prevent Policy, including Child Protection.

CEG's aim is to create an environment where staff are encouraged and feel confident to self-report. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

- it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
- crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour and no 'grey areas' are allowed to develop.

8. How should low-level concerns be shared and recorded?

A low-level concern can be shared verbally and/or in writing to the appropriate Investigating Officer using the 'CEG Safeguarding Report Form, including Low-level Concerns'.

Where the low-level concern is provided verbally, the recipient of it should make an appropriate record of the conversation, either contemporaneously or immediately following the discussion.

Where a low-level concern relates to a person employed by a supply agency or a contractor, CEG will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

Staff should be aware that when they share what they believe to be a low-level concern, the person receiving the report will speak to the adult who is the subject of that concern no matter how low-level the concern may be perceived to be (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted). The purpose is to gain the subject's account and to make appropriate records which may be referenced in any subsequent disciplinary proceedings.

Appropriate and detailed records must be kept of all internal and external conversations regarding the concern, their determination, the rationale for their decision and any actions taken. Records must be kept in accordance with the Low-level Concerns Procedure (section 11).

9. Will staff who share low-level concerns be able to remain anonymous?

Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named, CEG will respect that person's wishes as far as reasonably possible. However, there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, CEG will not promise anonymity to members of staff who share low-level concerns.

10. How should a low-level concern be responded to?

Once the Investigating Officer has received the low-level concern, they will, in conjunction with the CEG DSL and People Team if appropriate, collect evidence where necessary by speaking:

- directly to the person who raised the low-level concern (unless it has been raised anonymously).
- to any individual involved and any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

The Investigating Officer will use the information collected to categorise the type of behaviour and determine any further action, in line with the Safeguarding and Prevent Policy (including child protection) and following discussion with the CEG DSL.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the Investigating Officer may need further guidance on will be referred to the LADO for advice.
- Low level concerns that are not serious enough to consider a referral to the LADO may be discussed with the LADO, to seek advice on a no-names basis if necessary.
- Low level concerns that the centre can deal with internally will be dealt with via the CEG usual safeguarding and child protection investigation process.
- The Investigating Officer will engage with the People Team where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.
- If the reported concern, when considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, it should be referred to the LADO/other relevant external agencies.

11. What action will be taken if it is determined that the behaviour is entirely consistent with the Safeguarding and Prevent Policy (including child protection) and the law?

The Investigating Officer will update the individual in question and inform them of any action taken (as above).

The Investigating Officer will speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with Safeguarding and Prevent Policy (including child protection) and the law.

12. What action will be taken if it is determined that the behaviour constitutes a low-level concern?

The Investigating Officer will respond in a sensitive and proportionate way, maintaining confidence that such concerns when raised will be handled promptly and effectively whilst protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

If the Investigating Officer considers that the CEG disciplinary procedure may be triggered, they will refer the matter to the People Team. If the People Team advise that the CEG disciplinary procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

The response to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern i.e. whether they are an employee or worker to whom the CEG disciplinary procedure would apply; or a contractor or volunteer. The CEG response will be tailored accordingly.

13. What action will be taken if it is determined that the behaviour, whilst not sufficiently serious to consider a referral to the LADO, nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary?

Action (if/as necessary) will be taken in accordance with the LADO's advice.

14. What action will be taken if it is determined that the behaviour, when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation?

It will be referred to the LADO/ other relevant external agencies, and in accordance with the CEG Safeguarding and Prevent Policy, Part 4 of KCSIE 2024 and the relevant procedures and practice guidance stipulated by the appropriate Local Safeguarding Partnership.

15. How should low-level concerns be held?

CEG will retain all records of low-level concerns (including those which are subsequently deemed to relate to behaviour which is entirely consistent with the Safeguarding and Prevent Policy (including child protection). The records will be kept confidential, held securely and comply with relevant local data protection laws.

Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These records will be kept confidential and held securely and retained at least until the individual leaves employment at CEG.

16. Will low-level concerns be reviewed?

Records will be reviewed on a termly basis so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In centres, the review will be undertaken by the Centre Director and CEG DSL. A review of central team will be undertaken by a nominated member of the People Team and the CEG DSL.

Where a pattern of such behaviour is identified a panel, which could include the Investigating Officer(s), the CEG DSL and People Team member, will decide on a course of action which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO, where a pattern of behaviour moves from a concern to meeting the harm threshold.

If unsure whether the concern potentially raises a misconduct or capability issue, in the first instance advice may be taken from the People Team on a named or no-named basis.

Where a pattern of behaviour is identified in respect of a specific individual, the panel will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether CEG should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

Where a low-level concern relates to agency staff, contractor or visitor, CEG will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

A record of these reviews will be made.

17. How long will the records of low-level concerns about a member of staff be retained?

KCSIE does not prescribe any timeframe here. Low-level concerns will be retained securely by CEG for as long as deemed relevant and necessary for a safeguarding purpose unless CEG is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves CEG, any low-level concerns which are held relating to them:

- will be retained for the same duration as that individual's personnel file
- will not be included in any onward reference, except as set out at paragraph 19.

18. What about Data Protection and Confidentiality (Privacy)?

CEG will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-level Concerns Procedure and in keeping records of low-level concerns secure.

The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the CEG Safeguarding and Prevent Policy, including Child Protection

A proportionate approach must be taken by all to consider what personal data is in fact necessary to share and record by way of low-level concern(s) in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and as far as possible recorded in neutral terms.

If a member of staff who raises a low-level concern does not wish to be named, then CEG will respect their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived.

All staff are entitled, under data protection law (third-party disclosure of information), to ask to see the content of any low-level concern(s) retained by CEG under the Low-level Concerns Procedure as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. CEG will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-level Concerns Procedure).

CEG has undertaken a Data Protection Impact Assessment (“DPIA”) in relation to the processing of low-level concerns, subject to ongoing review and any necessary updates from time to time.

All personal data processed in connection with the Low-level Concerns Procedure will be processed in accordance with the CEG Privacy Notice.

19. References

Low-level concerns will not be included in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Any allegations that were proven to be false, malicious or unsubstantiated would not be included in employer references.

20. What is the role of the CEG Executive Board?

The CEG DSL will regularly inform the Executive Board about the implementation of the Low-level Concerns Procedure and any evidence of its effectiveness, e.g. by including reference to it in any safeguarding reports and providing any relevant data.

The Executive Board will also review an anonymised sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

21. Monitoring and Review

The Low-level Concerns Procedure will be monitored to ensure that it is being effectively implemented in practice and will be reviewed annually by the CEG DSL be reviewed annually or sooner should there be any relevant legislative, statutory or regulatory changes and/or changes in relevant guidance and/or safeguarding best practice.

22. An illustration of the distinction between an allegation that may meet the harm threshold, and a concern (including an allegation) that does not meet the harm threshold i.e. a low-level concern.

| | |
|----------------------------|--|
| ALLEGATION | Behaviour which indicates that an adult who works with children has: <ul style="list-style-type: none">● behaved in a way that has harmed a child, or may have harmed a child; and/or● possibly committed a criminal offence against or related to a child; and/or● behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or● behaved or may have behaved in a way that indicates they may not be suitable to work with children |
| LOW-LEVEL CONCERN | Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult may have acted in a way that: <ul style="list-style-type: none">● is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and● does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, on a no-names basis if necessary |
| APPROPRIATE CONDUCT | Behaviour which is entirely consistent with the CEG staff code of conduct, and the law |

Appendix 3 Handling a Disclosure If a child or adult at risk tells an employee about possible abuse:

LISTEN

- Listen quietly and carefully to what the person is saying
- Be patient and focus on what you're being told
- Let the person make the disclosure at their own pace and in their own way
- Do not express your own views and feelings. If you appear shocked or as if you don't believe them, it could make the person stop talking and take back what they've said
- Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the person is telling the truth
- Avoid interrupting, asking leading questions or probing for more information than the person wants to give you. Do not put words into the person's mouth
- Ask open questions, eg 'Is there anything else you want to tell me?'
- Take it seriously – you must follow the REASSURE and REPORT procedures

REASSURE:

- Let the person know they've done the right thing by telling you. Reassurance can make a big impact
- Make sure they know you'll listen
- Tell them:
 - It's not their fault. Abuse is never someone's fault. It's important they hear, and know, that
 - You'll take them seriously. They may have kept the abuse or concern to themselves because they were scared they wouldn't be believed
- Never promise to keep the information confidential
- Explain to the person that you are not able to investigate what they have told you, but that you will need to discuss the issue with someone who has responsibility for safeguarding and/or Prevent. You must pass the information on, but only those that need to know about it will be told

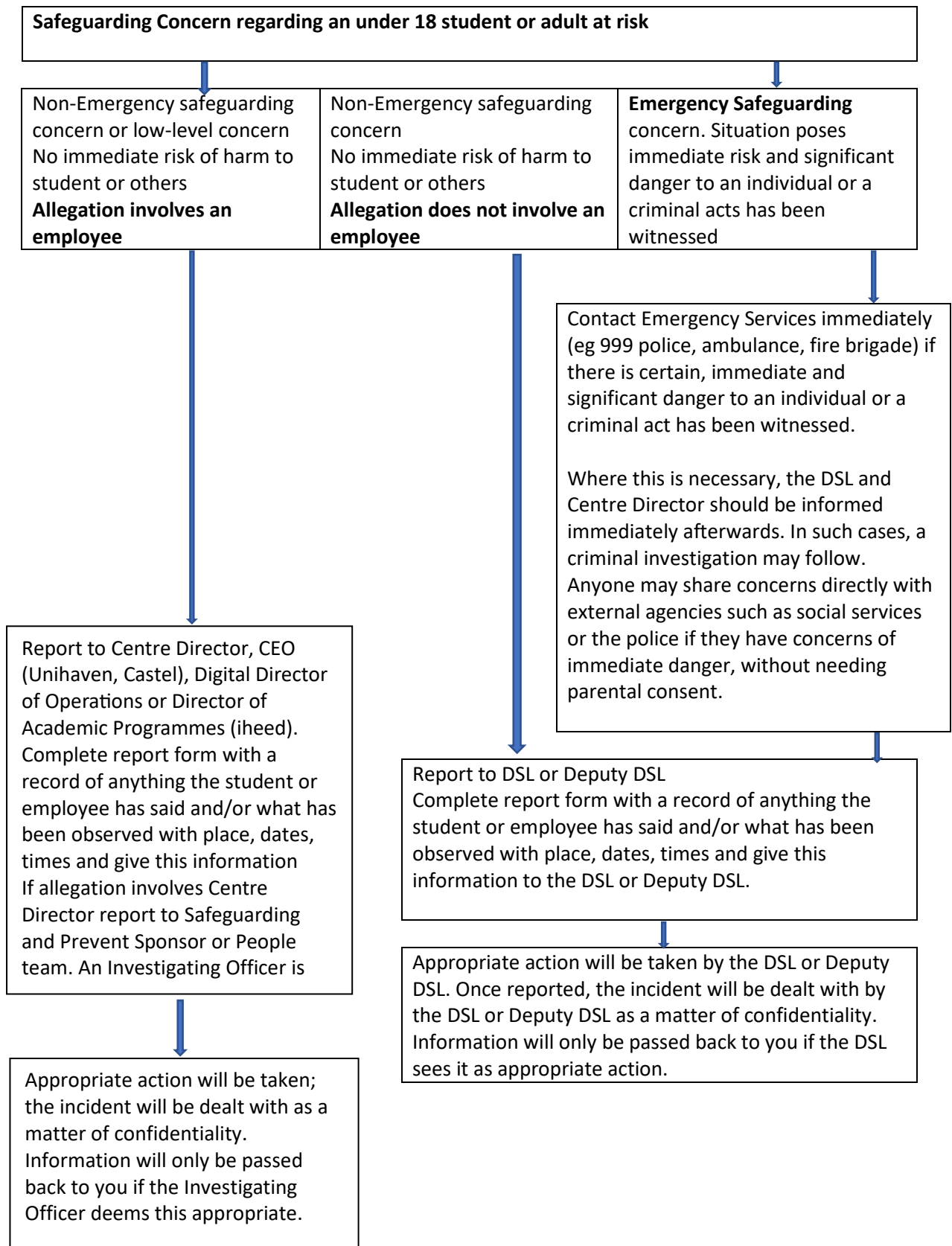
REPORT:

- Do not make any attempt to solve or tackle a safeguarding issue yourself. This is not your role
- Do not ask the person to repeat what they have told you to another team member or student
- Report what the person has told you as soon as possible to the appropriate Designated Safeguarding Lead (DSL) so the details are fresh in your mind and action can be taken quickly
- Make notes as soon after the disclosure has been made. Keep these as accurate as possible. Include date, time, place. Be specific. Record the actual words used, including any swear words or slang. Record statements and observable things, for example how the person appeared. Do not include your interpretations or assumptions – keep it factual
- Do not destroy your notes in case they are required by Court. Pass these to the DSL
- Do not discuss the disclosure or allegation with anyone else
- Do not go back to the person who made the disclosure or reopen a conversation with them - the DSL will take the further action which is needed
- If the DSL is not available, report to their Deputy
- If the allegation concerns a member of staff: centre teams report this to the Centre Director; central teams report to the Safeguarding and Prevent Sponsor.

Your wellbeing: safeguarding is a highly emotive and emotional subject. Listening to a disclosure can be upsetting. Please keep in mind the support available to you, including our EAP programme and mental health first aiders.

Appendix 4

Handling a Disclosure: Reporting Process



Appendix 5

Reporting and dealing with allegations involving a CEG employee

Allegations against any member of staff, whether employed or a former employee (including claims of historical abuse) will be managed in line with Keeping Children Safe in Education, September 2024. If a disclosure is received against a staff member, the following actions must be taken:

1.0 If the allegation concerns a centre team member:

- 1.1 The report would be made to the Centre Director (OnCampus), CEO (Unihaven, Castel), Digital Director of Operations or Director of Academic Programmes (iheed)
- 1.2 If the person named in 1.1 is not available, refer to the Director of Student Experience and Safeguarding – this person will be the Investigating Officer.
- 1.3 The person receiving the allegation will contact the People Team immediately.

2.0 If the allegation concerns the Centre Director, CEO (Unihaven, Castel), Digital Director of Operations or Director of Academic Programmes (iheed):

- 2.1 Report to the Director of Student Experience and Safeguarding who will notify the People team immediately.

3.0 If the allegation concerns a non-centre based employee:

- 3.1 Report to the Director of Student Experience and Safeguarding who will inform the People team immediately.

4.0 If the allegation concerns the Director of Student Experience and Safeguarding:

- 4.1 Report to the Executive Sponsor who will notify the People Team immediately.

5.0 If the allegation concerns a member of the Executive:

- 5.1 Report to the People Director immediately.
- 5.2 If the allegation concerns the People Director, report to the Group Chief Operating Officer.
- 5.3 Alternatively, use the CEG Whistleblowing Policy which can be found in the Help Centre.

6.0 If the allegation involves a child, the person receiving the allegation will take the following actions:

- 6.1 The allegation will be referred to the appropriate local authority body (eg LADO in UK) within 24 hours of the allegation coming to light and before an investigation has been started. Referral should not be delayed to collect information.
- 6.2 If an allegation requires immediate action but is received outside office hours, the person managing the allegation should consult the local children's services emergency duty team (eg MASH in UK).
- 6.3 Failure to report an allegation or concern in accordance with procedures is a potential disciplinary matter.
- 6.4 Advice or guidance offered by the local LADO or equivalent must be acted upon.
- 6.5 Should an external child protection investigation and/or police investigation be required then this may be undertaken before any internal CEG procedures are actioned.

7.0 As soon as possible after an allegation is made or a concern of suitability is raised, the Centre Director should inform the parent(s) or carer(s) of the child/ren involved, having checked GDPR permissions.

- 7.1 The local LADO or equivalent should be consulted first to ensure that this does not compromise the investigation.

- 7.2 In some circumstances, the parent(s)/carer(s) may need to be told immediately e.g. if a child is injured and requires medical treatment.
- 7.3 The parent(s)/carer(s) and child should be helped to understand the processes involved and kept informed, where appropriate, about the progress of the case.

8.0 In liaison with the People Team the CEG Disciplinary Policy will be followed with the below considerations from a safeguarding perspective:

- 8.1 Local authorities may need to be involved in developments as required, eg local police, LADO. Outcomes of investigations may also need to be communicated to LADO and/or the Disclosure and Barring Service (DBS) (equivalents in the other nations) for consideration to be barred from working with children.
- 8.2 Referral to a professional registration/regulatory body, for example the General Teaching Council on the grounds of misconduct.
- 8.3 Possible outcomes of an investigation could include referral to the barring lists or regulatory body.
- 8.4 Where a strategy discussion is required with the Police or children's social care (or equivalent), information about the allegation should not be shared until those agencies have agreed what information can be disclosed to the person who is the subject of the allegation.

Where allegations are unfounded or malicious the investigating officer will need to consider:

- 8.5 If the safeguarding allegation was made by a child, then there is a need to consider if a referral to children's social care is required to determine if that child is in need of services, or may have been abused by someone else.
- 8.6 If the safeguarding allegation was deliberately invented or raised maliciously by an adult then this could be discussed with the police and advice sought.
- 8.7 Whether disciplinary action is required.
- 8.8 If the person making the malicious or unfounded allegation is a member of staff.
- 8.9 The support needs of the person who was the subject of the safeguarding allegation.

Appendix 6

Reporting a Safeguarding Disclosure or Low-level Concern

If you have a safeguarding concern that is

- (a) as a result of direct disclosure;
- (b) a concern expressed by a third party or
- (c) observation of a student or colleague,

you must report this to the Designated Safeguarding Lead (DSL) by email and confirm receipt before the end of the working day. As soon as possible, a comprehensive record should be sent to the DSL using the **Safeguarding Report Form** on the following page.

If you have a low-level concern, you must report this as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a specific incident).

If there is an immediate threat to life, always dial 999 and then inform the DSL.

Please remember:

- if the disclosure involves a member of staff in an education centre, report this straight to the Centre Director, CEO (Unihaven, Castel), Director of Operations (Digital) or Director of Academic Programmes (iheed).
- if the disclosure involves a non-centre member of staff, report this straight to the Director of Student Experience and Safeguarding if the disclosure involves the Centre Director, report this to the Director of Student Experience and Safeguarding or People Team.

In your email include:

1. Name of child/adult at risk
2. Date of birth and age of the alleged victim (if known)
3. Gender (M/F/other)
4. Name and address of parent/carer/guardian of alleged victim (if known and applicable)
5. The child/adult at risk's account
6. Time, location, date or other relevant information
7. Your relationship to who your safeguarding concern is about
8. Description of any visible bruising or other injuries
9. Any other observations/information: (including the child's or adult at risk's emotional state)
10. Action taken
11. Have external agencies been contacted? (yes/no)
12. Have the emergency services (999) or social services been contacted? (yes/no)
13. Name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers
14. Include your name, position, date and contact telephone number

CEG Safeguarding Report Form, including Low-level Concerns

This form should be used to record safeguarding concerns that are (a) as a result of direct disclosure; (b) a concern expressed by a third party or (c) observation of a student. It should also be used to report low-level concerns.

| | |
|---|---------------------|
| Name of child/adult at risk: | |
| Date of birth (of child/adult at risk): | Gender: (M/F/other) |
| Name and address of parent/carer/guardian of alleged victim (if known and applicable) | |
| The child's/adult at risk's account: | |
| Time, location, date or other relevant information: | |
| Your relationship to the person your safeguarding concern is about: | |
| Description of any visible bruising or other injuries: | |
| Any other observations/information: (including the child's or adult at risk's emotional state) | |
| Action taken: | |
| Have external agencies been contacted? (yes/no) If yes, include name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers | |
| Have the emergency services or social services been contacted? (yes/no) If yes, include name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers | |
| Signed: | |
| Name (print): | |
| Position: | |
| Contact telephone number: | |
| Date: | Time: |
| Date and time received by Designated Safeguarding Lead or appropriate member of staff: | |
| Action taken and reasons for the decision: | |
| Low-level concern: Yes/No (please delete and give reasons for your decision). | |
| Signed: | |
| Name (print): | |
| Position: | |

Contact telephone number:

Date:

Appendix 7

Reporting a Prevent Concern

If you believe that someone is at risk of radicalisation or have concerns about a potentially vulnerable person that is being exploited for the purpose of promoting extremist ideology, you must report this to the Designated Safeguarding Lead by email and confirm receipt before the end of the working day.

As soon as possible, a comprehensive record should be sent to the DSL using the **CEG Prevent Report Form** which follows.

If there is an immediate threat to life, always dial 999 or equivalent and then inform the DSL.

In your email include:

1. Name of child/adult at risk
2. Date of birth and age of alleged victim/person at risk (if known)
3. Gender (M/F/other)
4. Name and address of parent/carer/guardian of alleged victim (if known and applicable)
5. Your relationship to who your safeguarding concern is about
6. Describe concerns in as much detail as possible; please describe the specific concern(s) relevant to Prevent. For example:
 - a. How / why did the individual come to your notice in this instance?
 - b. Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
 - c. Has the individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How?
 - d. Does the individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
 - e. Is there something about the individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?
 - f. Has the individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?
 - g. Has the individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider *any* extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.
 - h. Please describe any other concerns you may have that are not mentioned here.
7. Complex needs: is there anything in the individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense?

For example:

 - a. Victim of crime, abuse or bullying
 - b. Work, financial or housing problems
 - c. Asylum or immigration issues
 - d. Personal problems, emotional difficulties, relationship problems, family issues
 - e. Any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency
 - f. Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
 - g. Educational issues, developmental or behavioural difficulties, mental ill health
 - h. Please describe any other need or potential vulnerability you think may be present

but which is not mentioned here.

8. Other information: please provide any further information you think may be relevant eg social media details, other agencies or professionals working with the individual etc
9. Have external agencies been contacted? (yes/no)
10. Have the emergency services (eg 999) or social services been contacted? (yes/no)
11. Name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers

12. Include your name, position, date and contact telephone number

CEG Prevent Report Form

This form should be used to record concerns if you believe that someone is at risk of radicalisation or have concerns about a potentially vulnerable person being exploited for the purpose of promoting extremist ideology. Record concerns that are (a) as a result of direct disclosure; (b) a concern expressed by a third party or (c) observation of a student.

| | |
|---|---------------------|
| Name of child/adult at risk: | |
| Date of birth (of child/adult): | Gender: (M/F/other) |
| Name and address of parent/carer/guardian of alleged victim (if known and applicable): | |
| Time, location, date or other relevant information: | |
| Your relationship to the person your safeguarding concern is about: | |
| Describe concerns in as much detail as possible; please describe the specific concern(s) relevant to Prevent. For example: <ol style="list-style-type: none">a. How / why did the individual come to your notice in this instance?b. Does it involve a specific event? What happened? Is it a combination of factors? Describe them.c. Has the individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How?d. Does the individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?e. Is there something about the individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?f. Has the individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?g. Has the individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider <i>any</i> extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.h. Please describe any other concerns you may have that are not mentioned here. | |
| Complex needs: is there anything in the individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense? For example: <ol style="list-style-type: none">a. Victim of crime, abuse or bullyingb. Work, financial or housing problemsc. Asylum or immigration issuesd. Personal problems, emotional difficulties, relationship problems, family issues | |

- e. Any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency
- f. Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories
- g. Educational issues, developmental or behavioural difficulties, mental ill health
- h. Please describe any other need or potential vulnerability you think may be present but which is not mentioned here.

Other information: please provide any further information you think may be relevant eg social media details, other agencies or professionals working with the individual etc

Action taken and the reason(s) for the decision:

Have external agencies been contacted (yes/no) If yes, include name and contact details of external agencies/emergency services/social services contacted – include any relevant reference numbers

Signed:

Name (print):

Position:

Contact telephone number:

Date:

Time:

Date and time received by Designated Safeguarding Lead or appropriate member of staff:

Action taken and reasons for the decision:

Signed:

Name (print):

Position:

Contact telephone number:

Date:

Appendix 8 Roles and Responsibilities

1. Heads of Department/Directors will ensure that:

- all employees have completed the required Safeguarding and Prevent training
- relevant staff have read and signed either Part 1 and Annex B of the Keeping Children Safe in Education guidance, or Annex A, as confirmed being appropriate to their role
- appropriate, accurate records are kept in relation to the reporting of suspected abuse
- appropriate risk assessments are undertaken and any issues addressed.

2. OnCampus Centre Directors and the CEO (Unihaven, Castel) have overall accountability for the safeguarding and welfare of students within their centre.

The day-to-day operation of this policy and its procedures will be the responsibility of the Centre Director who will ensure that:

- all employees have completed the required Safeguarding and Prevent training
- a staff member is allocated to the DSL or DSO roles
- all staff are aware of which staff have been allocated the roles of the DSL and DSO
- the Centre Director or CEO (Unihaven, Castel) DSL and DSO have current higher level safeguarding training that is updated every two years as a minimum
- all staff have read and signed either Part 1 and Annex B of the Keeping Children Safe in Education guidance, or Annex A, as confirmed being appropriate to their role
- all students know who to turn to for help, advice or support, can access services confidentially, quickly and easily, and have access to 24 hour support
- the centre emergency phone rota is accurate and available
- all reasonable steps are taken to ensure the whereabouts of any student who is aged under 18 years or considered an adult at risk
- all relevant employees are made aware of the special needs or particular vulnerabilities of individual students
- regular monitoring and reporting of welfare and safeguarding issues so that trends are identified and acted upon
- any reported suspicions and allegations of abuse of children or adult at risk in their centre are taken seriously and actioned swiftly and appropriately; to include discussion with central senior management colleagues as required
- appropriate liaison with local agencies (such as Social Services or the Police)
- appropriate, accurate records are kept in relation to the reporting of suspected abuse
- appropriate risk assessments are actioned for staff in relation to background screening checks
- completion of an annual Safeguarding audit.

3. Designated Safeguarding Lead (DSL)

This section is based upon KCSIE Guidance 2024, Annex C

In accordance with these guidelines, the DSL is responsible for the following:

3.1 Manage referrals: to the local authority eg children or adult social care and Channel programme, or equivalent, as required. To support staff who made referrals.

3.2 Working with others:

- a source of support, advice and expertise for all staff
- to be a point of contact with the safeguarding partners

- to liaise with the Centre Director to inform them of cases
- promote supportive engagement with parents and/or guardians.

3.3 Information sharing and managing the confidential, secure storage of child protection, adult at risk and Channel information.

3.4 Raising awareness:

- to ensure each member of staff has access to, and understands, the company's safeguarding policy and procedures, especially new and part-time staff
- to ensure the Safeguarding and Prevent Policy (including Child Protection) is available publicly

3.5 Training, knowledge and skills:

- training should be updated at least every two years
- undertake Prevent awareness training
- understand and support the Centre with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children and vulnerable at risk from the risk of radicalisation

3.6 Providing support to staff:

- support and advise staff and help them feel confident on welfare, safeguarding and child protection matters
- ensure that staff are supported during the referrals processes

3.7 Understanding the views of children/adults at risk:

- encourage a culture of listening among all staff
- understand the difficulties that children/adults at risk may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

3.8 Holding and sharing information: the critical importance of recording, holding, using and sharing information effectively is set out in KCSIE. The DSL will:

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping. The record must include notes on the discussions and decisions made, including the rationale for those decisions.

4.0 Designated Safeguarding Officer

Deputies will be trained to the same standard as the DSL and assist them in all matters of safeguarding, child protection and Prevent.

Appendix 9 Safety on Site

1.0 On arrival and where appropriate:

- 1.1 All visitors enter the site through the main door and report to administration staff
- 1.2 All visitors must state the purpose of their visit and who has invited them or who they wish to see. They should be ready to produce formal identification
- 1.3 All visitors are required to sign the Visitors Record Book which is always kept in reception
- 1.4 All visitors are required to wear a visitor's lanyard
- 1.5 All visitors are advised on local safeguarding procedures, including the DSL/DSO as well as emergency evacuations procedures and protocol
- 1.6 Visitors are escorted to their point of contact OR their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site.

2.0 Any visitor to the site who is not wearing a visitors badge is challenged politely to enquire who they are and their business on site. They should then be escorted to reception to sign the visitors' book and be issued with an identity badge or visitors lanyard.

3.0 All concerns about a visitor should be raised with the Centre Director/Head of Department immediately.

4.0 On departing, visitors leave via reception and:

- 4.1 Enter their departure time in the Visitors Record Book alongside their arrival entry
- 4.2 Return the visitors lanyard to reception

5.0 Checks of identity will be carried out annually onsite, for this visitors or contractor will need to provide defined documentation.

6.0 For further information specific to contractor management, please refer to the CEG management of contractor's policy.

7.0 Further information on Safe Working Practices is found in the Help Centre.

Appendix 10 CEG STATEMENT OF BEST PRACTICE (Safeguarding)

Guidance for Employees:

CEG employees and students are expected to take account of the guidance below in the way that they conduct themselves. This will ensure safety both for themselves and the other party.

- Respect all individuals whatever their age and treat all fairly, without prejudice or discrimination
- Be committed to actively preventing the exploitation and abuse of children and adults at risk
- Place the safety and wellbeing of the student first. This must be placed before any personal or organisational goals and before loyalty to friends and colleagues. Abuse in any form can happen within CEG
- Follow guidance on signposting, consultation and referral to appropriate services if you have concerns about individual students
- Ensure all face to face and online contact and communications with students is appropriate
- If an activity must involve a single student, this must occur in a space easily observed by other staff
- Never have a personal relationship with a student or prospective student
- Do not show favouritism towards any student or prospective student
- Staff are in a position of trust. Always act in a professional manner
- Consider your expected behaviour in certain situations and what might be considered unacceptable. Do not make sexually suggestive or inappropriate remarks to any member of the CEG community
- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities
- Physical restraint must only be used when a student is in imminent danger of inflicting an injury on themselves or on another, and then only as a last resort and if possible, with another member of staff as a witness
- Do not use touch as a form of communication, even to comfort a student who is distressed. Minor forms of friendly physical contact can be misconstrued
- If physical contact is necessary, e.g. for demonstration purposes, ensure it takes place only with the full consent of the student and that its purpose is clear
- Employee should not engage in social events with students except those organised by or approved by CEG, ensuring risk assessments are carried out where appropriate
- All education visits must be risk assessed and signed off by the Group Health and Safety lead, prior to the visit taking place. If an external company is involved, relevant checks and risk assessments are requested as part of our own risk assessment. Staff must use an activity risk assessment for all activities taking place off site
- Do not take students to your home
- Dress in ways that are appropriate to your role and meet the requirements of the CEG Dress Code and Appearance Policy (Help Desk)

Your safeguarding responsibilities: guidelines for working with students under the age of 18 years or adults at risk

- Complete all compulsory training as required
- Report any safeguarding concern which specifically relates to an under 18 year old student or adult at risk. Immediate action is required.
- Never give guarantees of confidentiality to students wishing to disclose information or make an allegation; only guarantee that the information will be passed on to those that need to know in order to ensure that the proper action is taken
- Be mindful that it is a criminal offence for any person in a position of trust to engage in, incite or promote sexual activity with someone who is under 18
- Remember local laws about the age for purchasing and consuming alcohol. Planning and organisation of events should take this into account.

Use of text, email, photographs and social media

- All communication with students must be through CEG designated platforms (eg outlook, Teams, Canvas, WhatsApp on a company phone).
- While a student remains under our license, until the end date for ICAS students or a student remains on one of our courses, staff **must never:**
 - give students their personal mobile phone number
 - communicate with students by text message, Whatsapp etc on a personal phone
 - give personal email addresses to students
 - communicate with students on personal social media sites (eg LinkedIn)
 - use a personal device to take photos/videos of students.
- All electronic communication with students must happen on company devices (company laptop or mobile phone), never on a personal device. This includes the taking of photographs.
- Always inform students the purpose of taking still or moving photographs of them and how these photographs will be used. Student consent must be requested at the time.
- Employees should not 'follow' or 'friend' students on social media sites.
- Avoid colloquial language/abbreviations which may be misinterpreted (eg LOL).
- Email security is taken seriously by CEG. Any employee noticing a breach of their email account or password should contact IT Support on <https://jira-ceg.atlassian.net>
- Where it is necessary for employee, students or volunteers to take photographs or video images of children or adult at risk, consent must be obtained before these images are taken in order to comply with the Data Protection Act 2018. For Under 18s, parental consent is a required part of the admissions process. Personal details and photos which clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs.
- Students should be suitably dressed in photographs.
- If you have a concern about photographs being taken of a student, please contact the centre's Designated Safeguarding Lead.

If you have any concerns or queries arising from reading this guidance please contact your line manager.

Appendix 11

Safeguarding Guidance for OnCampus Students, including Child Protection

Students are expected to take account of the guidance below in the way that they conduct themselves.

For further detail refer to the Student Disciplinary Policy

All students must:

1. Respect all individuals whatever their age and treat all fairly, without prejudice or discrimination
2. Adhere to the Centre and Partner University's rules and regulations
3. Be polite and considerate to other students, members of staff, and others
4. Turn up on time and attend all classes regularly
5. Work hard in class and meet all deadlines for all assigned work
6. Demonstrate positive behaviour at all times
7. Be responsible for your physical and mental wellbeing
8. Treat the Centre's premises and other people's property with respect
9. Complete your academic studies in a conscientious, honest and professional manner
10. Dress in ways that are appropriate for attending a place of study

Safeguarding and Child Protection

Safeguarding is the protection of children and adults at risk from harm and abuse. This can include protection from physical, sexual, or psychological harm. Safeguarding is also the protection of children and adults at risk from involvement with crime and/or terrorism.

A child: is any person under the age of 18

An adult at risk: is any person aged over 18 who by reason of mental or other disability, age or illness are (or may be) unable to take care of themselves or are (or may be) unable to protect themselves against significant harm or exploitation.

All students and staff are expected to be committed to the safeguarding of all members of the OnCampus community.

The guidance which follows explains what we need you to do to keep yourself and others in your Centre safe:

1. Follow the Centre guidance about who to tell if you are worried or have concerns about another student. If in doubt, contact your Head of Student Services or equivalent
2. Ensure all face to face and online contact with other students and your tutors is appropriate
3. Do not make sexually suggestive or inappropriate remarks to any member of the **ONCAMPUS** community
4. Do not use touch as a form of communication, even to comfort a student who is distressed. Minor forms of friendly physical contact can be misunderstood
5. Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes is not acceptable
6. No means no. Do not pressure anyone to do something they are not comfortable with, whether in person or online/messaging. If someone is pressuring you to do something that you are not comfortable with, speak with your Head of Student Services or equivalent
7. Remember that all people under the age of 18 are classed as children under the United

Nations Convention on the Rights of a Child

8. Check local laws regarding the age to purchase and drink alcohol
9. Never have a personal relationship with a member of staff
10. You will receive further guidance during your induction programme and Personal Tutorial lessons

What to do if you become aware of an incident involving sexting or sexual harassment:

Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline. It can occur between peers and is called peer-on-peer sexual harassment. Examples of sexual harassment include:

- calling someone a sexualised name
- sharing sexual images without consent
- making unwanted sexual comments and sending sexualised messages, including on social media (sexting)
- sexual coercion and threats
- making sexual remarks about clothes.

If you are the victim of sexual harassment or become aware of an incident involving sexual harassment you must:

1. Report it to your Designated Safeguarding Lead immediately
2. Never view, download or share a picture which you think is a sexual image – in the case of an Under 18, these pictures are illegal
3. If you have already viewed the imagery by accident (for example if the person has showed it to you before you could ask them not to), tell the Centre Director
4. Be reassured the Centre Director will help and support you

IMPORTANT:

If you sexually harass another member of the OnCampus community, action will be taken in accordance with the Disciplinary Policy and may lead to your removal from the programme.

Sending or sharing inappropriate images of an under 18 year old and illegal.

These are both considered criminal offences and the relevant authorities will be notified.

For further information, refer to the CEG Student Sexual Misconduct Policy and Procedure.

Radicalisation

Radicalisation means someone is being encouraged to develop extreme views or beliefs in support of terrorist groups and activities. If you have any concerns that someone you know is being radicalised, you must speak with your Centre Director.

Safe use of text, email, photographs, social media and learning platforms (for example, Teams)

1. All communications with staff members must take place through their CEG/OnCampus email address, a CEG-approved digital platform (eg Teams) or CEG/OnCampus phone number. Please note that most staff do not have a work phone number
2. You must not add teachers/staff as friends online – it is important that professional boundaries are maintained

3. Be thoughtful about what you say or post online. Always think:
Would I say or do this in a face to face situation?
Would it be appropriate if my teacher or another member of staff saw this?

If the answer to either of these questions is no, it is probably best not to share your comments online in the first place

4. Avoid abbreviations which may be misinterpreted (eg LOL)
5. Be thoughtful about who you give your personal mobile phone numbers or email addresses to: do you know the person very well?
6. Do not take photos or video images of other students without their permission. Always inform the other person of the purpose of taking still or moving photographs of them and how these photographs will be used
7. If you are on a video call in Teams, please blur your background

You must remember that sending or sharing inappropriate images of an under 18 year old is illegal.

Online bullying:

Online bullying is bullying which happens online via social networks, online games and websites. It is also called **cyber bullying**.

Online bullying can happen when using any device and takes many forms such as:

- Abusive/threatening texts, emails or messages
- Posting abusive comments on social media sites
- Sharing humiliating videos or photos of someone else
- Spreading rumours online
- Group bullying/exclusion online
- Trolling – sending someone menacing/upsetting messages through social networks/chatrooms/games

If you experience any form of cyberbullying, please speak to a member of staff, so that we can support you.

If you bully another student, action will be taken in accordance with the OnCampus Disciplinary Policy and may lead to your removal from the programme.

If you have any concerns or queries arising from reading this guidance, please speak with your Personal Tutor in the first instance.

Appendix 12

Further Information

Related CEG policies can be found at the Help Centre including:

- CEG Health and Safety Policies
- CEG Disciplinary Policy
- CEG Equality & Diversity Policy
- CEG Dignity at Work Policy
- CEG Domestic Abuse Guidelines
- CEG Whistleblowing Policy
- CEG Privacy Policy <https://www.cambridgeeducationgroup.com/privacy-policy/>
- OnCampus Attendance Policy
- CEG Student Sexual Misconduct Policy and Procedure
- OnCampus Missing Student Policy

OnCampus student policies can be found in the Programme Handbook (Canvas)

Keeping Children Safe in Education September 2024: Annex B 'Additional Advice and Support' provides links to government and recommended agency sites

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

Adult at Risk: <https://www.nhs.uk/conditions/social-care-and-support-guide/>

Prevent Strategy:

- <https://www.gov.uk/government/publications/prevent-strategy-2011>
- www.gov.uk/government/publications/prevent-duty-guidance
- The Counter-Terrorism and Security Act 2015:
<http://www.legislation.gov.uk/ukpga/2015/6/contents>
- Office for Students: <https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/>

Online Safety:

- <https://www.ceop.police.uk/Safety-Centre/>
- <https://swgfl.org.uk/>

Appendix 13

CEG Safeguarding and Prevent Policy (including Child Protection)

Acknowledgement Statement

By signing the below, I confirm that I have read the CEG Safeguarding and Prevent Policy in its entirety.

I am a team member who has direct contact with children and have read Part 1 of Keeping Children Safe in Education and Annex B

I am a team member who does not have direct contact with children and confirm that I have read Annex A of Keeping Children Safe in Education

I confirm that I have understood and confirm the below:

1. I know who the Designated Safeguarding Lead (DSL) and the Deputy Safeguarding Leads are for my centre/department and understand their role. I know how to contact them
2. I understand that it is everyone's responsibility to ensure the safeguarding of all under 18 students and adults at risk who are involved in any kind of communication with CEG, from first expression of interest and beyond completion of their course
3. That I have a legal duty to report any safeguarding concerns that I have to the DSL or Deputy DSLs as quickly as possible. If the allegation is made against a member of staff, I must report this to the Centre Head/allocated senior manager

Employee Name:

Role:

Department:

Signature:

Date: