



Safeguarding and Prevent Handbook

CONTENTS

1. Safeguarding and Prevent Policy4

2. The Prevent Duty7

3. Specific Roles and Responsibilities concerning Safeguarding.....9

4. Safeguarding definitions and guidance15

5. Safeguarding and Prevent Referral flowchart22

6. Incident Closure flowchart24

7. Anti-bullying26

8. Guest and Visiting Speakers Policy30

9. Emergency Response Lockdown Policy34

10. Online Safety Bill.....44

11. Safeguarding Acts, Guidance & Legislations Overview.....46

Safeguarding and Prevent Policy

'Creating a safe and respectful learning environment for all'

Detailed Table of Contents

| | | |
|------|--|----|
| 1. | Safeguarding and Prevent Policy | 4 |
| 1.1 | Safe and Sound Mission | 4 |
| 1.2 | Aims | 4 |
| 1.3 | Our commitment | 4 |
| 1.4 | The Statutory Framework and Definition | 5 |
| 1.5 | Legislation and guidance | 6 |
| 2. | The Prevent Duty | 7 |
| 2.1 | Radicalisation & Extremism | 7 |
| 2.2 | Responding to suspicions of radicalisation and extremism | 8 |
| 2.3 | Channel | 8 |
| 2.4 | Recognition of vulnerability factors | 9 |
| 2.4a | Identity Crisis | 9 |
| 2.4b | Personal Crisis | 9 |
| 2.4c | Personal Circumstances | 9 |
| 2.4d | Unmet Aspirations | 9 |
| 2.4e | Rejection | 9 |
| 2.4f | Experience of Criminality | 9 |
| 2.4g | Special Educational Need | 9 |
| 2.5 | More critical risk factors | 9 |
| 3. | Specific Roles and Responsibilities concerning Safeguarding | 9 |
| 3.1 | The Executive Committee/ Governors | 9 |
| 3.2 | Designated Safeguarding Lead | 10 |
| 3.3 | Designated Safeguarding Officers | 11 |
| 3.4 | Managers | 11 |
| 3.5 | Staff, Contractors and Volunteers | 11 |
| 3.6 | The 5 Rs | 12 |
| 3.7 | Confidentiality | 12 |
| 3.8 | Information sharing and record keeping | 12 |
| 3.9 | Responding to suspicions | 13 |
| 3.10 | Support for Staff | 13 |
| 3.11 | Allegations against staff | 13 |
| 3.12 | Low-level Concerns | 13 |
| 3.13 | Disciplinary action | 14 |
| 3.14 | Safer Recruitment Processes | 14 |
| 3.15 | Disclosure | 15 |
| 4. | Safeguarding definitions and guidance | 15 |
| 4.1 | Significant Harm | 15 |
| 4.2 | Welfare | 15 |
| 4.3 | Missing from Education / Non-attendance | 15 |
| 4.4 | Recognition of Abuse, including Neglect, Bullying and Cyber Bullying | 16 |
| 4.5 | Contextual Safeguarding | 16 |
| 4.6 | Types and Signs of Abuse | 16 |
| | Abuse | 16 |
| | Significant harm | 15 |
| | Physical abuse | 16 |
| | Sexual abuse | 16 |
| | Emotional abuse | 16 |
| | Neglect | 17 |
| | Child on Child abuse | 17 |
| | Risks/ abuse related to family/cultural belief/ | 17 |
| | Bullying and Harassment | 17 |
| | Cyber Bullying and E-Safety | 18 |
| | Domestic violence | 18 |
| | Female Genital Mutilation (FGM) | 18 |
| | Honour Based Abuse | 18 |

| | | |
|-----|--|----|
| | Forced Marriage..... | 19 |
| | Incels | 19 |
| | Modern slavery | 19 |
| | Risk to self and/or others | 19 |
| | Serious Crime | 19 |
| | Sexting | 19 |
| | Sexual violence and sexual harassment between learners | 20 |
| | Hackett's Continuum / Initiation/Hazing | 21 |
| | Upskirting..... | 21 |
| 5. | Safeguarding and Prevent Referral flowchart | 22 |
| | 5.1 Safeguarding and Prevent Referral Grid | 23 |
| 6. | Incident Closure flowchart | 24 |
| | 6.1 Incident Closure Grid | 25 |
| 7. | Anti-Bullying for Learners and Staff | 26 |
| | Introduction | 26 |
| | Definition of Bullying..... | 26 |
| | Cyberbullying | 27 |
| | Signs of Bullying | 27 |
| | Preventing Bullying | 27 |
| | Learners with a Learning Difficulty and/or Disability / LGBTQ | 28 |
| | Responsibilities and Roles | 28 |
| | Linked Documents | 29 |
| | Helplines | 29 |
| 8. | Guest and Visiting Speakers Policy | 30 |
| | Introduction | 30 |
| | 8.1 Appendix 1 Agreement & Guidelines | 30 |
| | 8.2 Appendix 2 – Sample Risk Assessment | 32 |
| | Risk Banding | 33 |
| 9. | Emergency Response Lockdown Policy and Procedure | 34 |
| | Summary | 34 |
| | Partial Emergency Response Lockdown | 34 |
| | Partial Emergency Response Lockdown Immediate Action | 34 |
| | Full Emergency Response Lockdown | 35 |
| | Full Emergency Response Lockdown Immediate Action | 35 |
| | Planning for an Emergency Response Lockdown | 35 |
| | Emergency Response Lockdown Plan | 36 |
| | Emergency Services | 37 |
| | Roles & Responsibilities | 38 |
| | Shared Buildings | 38 |
| | 9.1 Emergency Response Lockdown Fact Sheet for Staff & Learners..... | 38 |
| | What happens during a lockdown | 39 |
| | Situational awareness..... | 40 |
| | Basic safety rules | 40 |
| | Centre emergency lockdown poster | 43 |
| 10. | Online safety Bill | 44 |
| | Protecting Children..... | 45 |
| | Safeguarding Acts, Guidance & Legislations Overview | 46 |

1. Safeguarding and Prevent policy.

1.1. Safe and Sound Mission

Through developing practice, collaboration, research and dissemination, the Safe and Sound team seeks to ensure that everyone in our care receives support and protection to meet their individual needs. This group includes leads on Safeguarding, Health and Safety, Prevent and Equality, Diversity and Inclusion. Babington Senior Executive Board fully endorses this Policy and Guidance.

This Policy sits within the Safe and Sound framework which has been developed to bring together the key principles of Safeguarding, The Prevent Duty, Equality, Diversity and Inclusion and Health, Safety and Well-being. It applies to all staff, including senior managers, the Board, volunteers and seasonal workers, agency staff, learners or anyone working for and on behalf of the Babington.

The term 'learner(s)' used in this policy refers to young and/or vulnerable learners of Babington (internal or subcontractors') who attend interviews, online learning, study in centres or in their place of work.

1.2 Our aims

- Promote fundamental British values, including freedom of speech, rights to be safe and listened to, by creating an environment that encourages every learner to raise any concerns.
- Encourage all learners to develop a sense of autonomy and independence in their learning and development.
- Enable all learners to have the self-confidence and the vocabulary to resist inappropriate approaches.
- Work with employers to build their understanding of and commitment to the principles of Safeguarding and Prevent duty.
- Liaise with other statutory agencies to ensure Safeguarding and Prevent duty legislative procedures are current.
- Liaise with external agencies to support staff and learners where a Safeguarding and/or Prevent concern has been raised.

1.3 Our commitment

- We promote the Welfare and Safeguarding of every learner.
- We are committed to practise in a way that protects every learner.
- We believe that learners should never experience any form of abuse, discrimination, harassment, or victimisation.
- We will protect learners from radicalisation and extremism, by responding swiftly where learners are vulnerable to these issues.
- We protect learners who receive our services. This includes the children of learners who use our services and any siblings of learners.
- All learners receive programme inductions which includes raising awareness of Babington's commitment towards Safeguarding, details of the support services that can be offered and contact details for the Safeguarding team. The understanding of all aspects of Safeguarding and safe working practices is checked at each review and the opportunity to discuss any issues is given.
- The requirements for DBS checks are assessed and the relevant processes undertaken when required.
- We will provide staff and volunteers with regular updates and annual training on Safeguarding and Prevent.
- We recognise that ignoring abuse is not an option and all staff must report any concerns

- for the wellbeing or safeguarding of learners in accordance with this policy.
- Employers are made aware of and understand relevant Babington policies.
- Health and Safety checks are completed for our younger 16–18-year-old learners with a young person's induction assessment completed.
- Assessments are made to ensure that the learners wellbeing is safeguarded by the work placement and their teams to ensure arrangements are in place to, prior to work related activity commencing.
- We will record and check the details of all visitors to all our premises.
- We commit to keeping a Safeguarding and Prevent Action plan/risk register and monitor the impact of our actions.

1.4 The Statutory Framework and Definition

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network⁴ through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

The Children Act 2004 (England & Wales), Children (Scotland) Act 1995 and The Children (Northern Ireland) Order 1995 places a duty on local authorities to investigate situations where a child is at risk of significant harm. The act and subsequent legislation and guidance are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18.

Keeping Children Safe in Education 2025 - Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18. and learners over 18 who continue to be vulnerable due to a learning difficulty and/or disability. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

What staff should look out for.

- Early Help – any child may benefit from early help especially if the learners is disabled or has specific additional needs or special educational needs.
- Abuse and Neglect
- Domestic Abuse
- Child on Child Abuse
- Young Carers
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Learners missing and absent from education.
- Serious Violence and Sexual Violence
- Those at risk of Harmful practises.

- Those at risk of Honour Based Abuse.
- Female Genital Mutilation (FGM)
- Forced Marriage
- Child Abduction and community safety
- Modern Slavery
- Looked after Children (LAC)
- Online and Cybercrime
- Homelessness
- Mental Health
- Learners from black and minoritised backgrounds.
- Those with abuse & trauma in their past.
- Those living in sheltered accommodation or other care facilities
- Children and the Court System.

1.5. Legislation and Guidance

This policy and related procedures are driven by the following legislation and guidance (see appendix for additional details):

- The Children Act 1989 – amended 2004 (England & Wales).
- The Safeguarding Vulnerable Groups Act 2006
- The Children (Northern Ireland) Order 1995.
- The Children (Scotland) Act 1995.
- Safeguarding Children: Working Together Under the Children Act 2004.
- Working Together under the Children Act 2004 - Health in Wales.
- National guidance for child protection in Scotland.
- The Protection of Vulnerable Groups (Scotland) Act 2007.
- Protection of Freedoms Act 2012.
- Care Act 2014.
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2023.
- Prevent Duty Guidance for England and Wales (2023).
- The Terrorism Act 2000 (NI).
- Counter Terrorism and Security Act 2015.
- Modern Slavery Act 2015.
- What to do if you are worried a child is being abused (2015).
- Children Missing in Education (2024).
- Multi-agency guidance on FGM (2016 updated 30/07/2020).
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Internet Safety (UKCIS), 2016).
- Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers (2017).
- Disqualification under the Childcare Act 2006 (updated in 2018).
- General Data Protection Act (2018).
- Working Together to Safeguard Children 2023.
- Education and Training (Welfare of Children) Act 2021.
- Keeping Children Safe in Education (KCSIE) 2025.
- Anti-social Behaviour, Crime and Policing Act 2014.

2. The Prevent Duty

2.1 Radicalisation & Extremism

The Prevent duty guidance 2023 has been refreshed and updated to reflect several recommendations from the independent review of Prevent with the last update being (6th March 2024)

We need to tackle the cause of ideological causes of terrorism. Ideology must be considered when delivering all aspects of Prevent. Reducing permissive environments is crucial when tackling the ideological causes of terrorism. Extremist groups have attempted to radicalise vulnerable learners to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The Counter Terrorism and Security Act places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("The Prevent duty").

Prevent is about keeping our learners both safe and within the law. The Prevent Duty is not about preventing learners from having political and religious views, rather to support them to develop and discuss those views or act on them in non-extremist ways.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make learners vulnerable to future manipulation and exploitation.

Babington is clear that this exploitation and radicalisation should be viewed as a Safeguarding concern and that protecting learners from the risk of radicalisation is part of our Safeguarding duty.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Learners may become susceptible to radicalisation through a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that Babington staff can recognize those vulnerabilities.

Extremism is defined by the Government in the Prevent Strategy as: vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The UK government new definition of extremism 2024 is, "Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to":

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

2.2. Responding to suspicions of radicalisation and extremism

We are alert to changes in a learner's behaviour or attitude which could indicate that they need help or protection.

- When any member of staff has concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the On-Duty Designated Safeguarding Officer for investigation and action.
- Disclosure records are held by the Safe and Sound team and stored on a secure server.
- A prevent referral will be made if needed to the local area CT Police using the national referral form and /or the DFE regional co-ordinator will also be informed.
- Staff take care not to influence the outcome either through the way they speak to or question learners.
- We will continue to welcome the learner whilst investigations are being made. The learner may choose to withdraw from learning activities whilst investigations take place.
- We follow the procedures as set by the Safeguarding Children Partnerships in relation to the delivery of services and designated roles and tasks in supporting the learner, family, and employer subsequent to any investigation.
- All suspicions and investigations are kept confidential and shared only with those who need to know.
- Any information is shared under the guidance of the Regional Prevent Coordinator HE/FE.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most learners do not become involved in extremist action. For this reason, the appropriate interventions in any case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

2.3 Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity.
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

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

Babington has a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Further guidance about duties relating to the risk of radicalisation is available in the Prevent Duty Guidance for FE.

2.4 Recognition of vulnerability factors can include:

- **2.4.a Identity Crisis** – the learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society. This could also affect trans / non- binary identities.
- **2.4.b Personal Crisis** – the learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- **2.4.c Personal Circumstances** – migration; local community tensions; and events affecting the learner's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **2.4.d Unmet Aspirations** – the learner may have perceptions of injustice or a feeling of failure.
- **2.4.e Rejection** – the learner may reject civic life.
- **2.4.f Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, ex-offenders, victims of crime and poor resettlement / reintegration.
- **2.4.g Special Educational Need** – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all learners experiencing the above are at risk of radicalisation for the purposes of violent extremism.

2.5. More critical risk factors could include:

- Being in contact with extremist recruiters.
- Xenophobia, misogyny and hate of others.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

3. Specific roles and responsibilities concerning Safeguarding and Prevent

3.1 The Executive Committee/ Board will:

- Have strategic leadership responsibility for Babington's safeguarding arrangements.
- Review this policy and the effectiveness of its implementation annually.
- Meets with the Designated Safeguarding Lead on a regular basis to monitor both the volume and progress of concerns to ensure that Babington is meeting its duties in respect of safeguarding.
- Will ensure training and regular professional development is provided to designated safeguarding leads.
- Keep fully abreast of the guidance available for safeguarding.

3.2 The Designated Safeguarding Lead will:

- Report recommendations for changes to the Company Safeguarding and Prevent Policy and Procedures considering legislative changes, to the Board of Directors. ensure constant availability of support for staff and learners (during working hours). through an organised Safe and Sound rota.
- Undertake regular and appropriate advanced Safeguarding training for this role.
- Make the decision to refer any allegations or concerns about abuse to the statutory. safeguarding partners for investigation.
- Address any immediate protection issues.
- Make the decision and support staff to refer to an appropriate statutory agency. (Police, Local Authority, Social Services and Prevent) using the National referral form.
- Liaise with Safeguarding Children Partnership.
- Any Prevent related concerns will be securely transferred when a young person moves college in line with KCSiE 2025.
- Ensure employees are trained on Company Safeguarding procedures and prevent suitable to their role.
- Source appropriate external training for Safeguarding as and when needed.
- Further develop and support an annual CPPD record on Prevent for all DSO staff.
- When on duty, log all issues and monitor cases to resolution/ and keep the action safeguarding database updated.

Work with others

- Liaise with Senior Executive / Board to inform of issues and/or ongoing enquiries related to Safeguarding and Prevent
- Liaise and work with the People and Talent team when concerns are linked to staff who are also Babington Apprentices
- Ensure that we have effective IT services, filtering, and monitoring and a detailed annual audit.
- As required liaise with “case manager” and the Designated Safeguarding Lead at the Local Authority for child protection concerns on all cases which concern a Staff Member.
- Lead on the DSO team, ensuring DSOs receive the right support when dealing with complicated cases and ensure they have full debrief and ongoing support themselves if required
- Liaise with staff on matters of safety and safeguarding when deciding whether to make a referral by liaising with relevant external agencies.
- Act as a source of support, advice and expertise for staff.
- Link with Local Children's and Adult's Safeguarding Hubs as required.
- Work with trainers and tutors to ensure Learner Protection File are transferred to new College, Training Provider or other support services.
- Availability by email, telephone or in person where required to deal with any incidents.

Continue to develop and raise awareness.

- Ensure an open and listening culture.
- Alert to specific learner in need, SEN, Young Carers and “Looked after Children”.
- Understand the assessment process for providing early help and intervention, through locally agreed common and shared assessment process (Safeguarding Children Partnerships).
- Have working knowledge of Safeguarding Children Partnerships.
- Understand Prevent Duty, providing advice and support to staff.
- Develop staff awareness of and adherence to policies and processes.
- Keep detailed, accurate, secure written records of concerns and referrals.

3.3 Designated Safeguarding Officers will:

- Report on best practice and recommendations for improvements to the Company Safeguarding & Prevent Policy and Procedures to the Safeguarding Lead/s.
- Make the decision to refer any allegations or concerns about abuse to the statutory safeguarding partners for investigation.
- Address any immediate protection issues.
- Carry out any internal investigations regarding Safeguarding.
- Make the decision to refer to an appropriate statutory agency (Police, Social Services, Local Authority and Prevent).
- Liaise with Safeguarding Children Partnership.
- Work closely with staff to respond to any immediate welfare and/or safeguarding concerns.
- Work closely with the Designated Safeguarding Lead to escalate immediate protection issues.
- Work with trainers and support teams to develop the confidence of all when speaking with learners regarding welfare and Safeguarding, Prevent discussions.
- Undertake regular and appropriate training for this role.
- Keep up to date with Safeguarding and Prevent policy changes.
- Work to promote Safeguarding and Prevent best practice.
- Attend regular updates and meeting with DSL and other DSOs.
- Complete the Designated Safeguarding training at level 3 or 4 by an approved training provider and refresher training as appropriate (As a minimum every 2 years).

3.4 Managers will:

Set a positive 'culture' which is supportive of the safeguarding arrangements and ensure that this Policy is brought to the attention and well understood by all their employees.

- Ensure that the Policy and associated procedures are implemented effectively.
- Monitor the performance of their own employees to ensure Policy requirements and Company standards are being met.
- Ensure that risks are assessed and that appropriate risk reduction measures are developed for all work tasks and activities.
- Ensure their employees have appropriate instruction, training and development to enable them to fulfil their Safeguarding and Prevent responsibilities and to work safely.
- Ensure that all incidents of suspected or alleged abuse are reported immediately.
- Ensure all employees are aware they should discuss absences training sessions to Babington.
- Set a good example and promote responsible attitudes among employees, learners and employers.

3.5 All staff, contractors and volunteers will:

Promote the health, safety and welfare of learners

- Abide by the codes of conduct for Babington employees
- Be prepared to listen to and take seriously the concerns of learners, carers and volunteers
- Will report any concerns in relation to vulnerabilities to the Safe and Sound team at the earliest opportunity.
- Be alert to signs of abuse and extremism and take responsibility for referring any concerns to Babington Safe and Sound Team
- Set a good example and promote responsible attitudes to learners by their own behaviour
- Ensure that any relevant history of the learner, particularly in relation to potential indicators of abuse or neglect is recorded confidentially within their records in line with GDPR
- Work closely and collaboratively with all sub-contractors and employers to ensure that

they have appropriate and effective Safeguarding and Prevent policies and procedures in place, and these are audited on a regular basis by Senior Managers, Quality and Service Standards team, Safe and Sound team, and the Subcontractor Manager. This includes learners that are participating in Work experience and off-site activities.

3.6 The 5 Rs

Everyone has a responsibility to actively make the learning environment safe and secure for all by following the **5 R's**:

- **Recognise** - One of the most important roles for any employee is to be able to recognise abuse or neglect in the course of their everyday work. Sometimes, the signs are obvious such as broken bones or cuts and bruises. However, sometimes the signs are a lot less easy to identify.
- **Respond** - All employees working with learners need to be alert to signs of abuse or neglect and know how to respond appropriately (including knowing who in their organisation to share their concerns with and where appropriate, knowing how to ask relevant non-leading questions to see if there is a reasonable and consistent explanation for the signs observed)
- **Recording** - When recording an incident, a Safeguarding Report Form must be completed (*available on the Safe and Sound Hub*). The document must be forwarded to the Safe and Sound team at safeguarding@babington.co.uk by close of business the same day. Please be aware that this must be completed before 5pm and at the earliest opportunity to allow the On-Duty DSO time to contact you and make the relevant checks and address concerns appropriately in a timely manner. Whilst you can record observations, do not interpret or give opinion as this may bias the information provided and jeopardise any future investigation into the allegation. The Safeguarding Report Form must be deleted from your pc and sent mailbox once you received confirmation from the On-Duty DSO, they have processed your concern.
- **Report** - Any issues or concerns, allegations or suspicions relating to Safeguarding must be taken seriously and reported to an On-Duty Safeguarding Designated Officer or Designated Safeguarding Lead.
- **Refer** - Where required, the Safeguarding Representative will refer or support you with guidance on next steps and / or signposting to the relevant external agency.

3.7 Confidentiality

A good working relationship between staff and learners depends to a large extent on the establishment of trust. However, guarantees of absolute confidentiality should not be given especially when dealing with a serious Safeguarding concern that needs to be escalated immediately or where there is a threat to life. If a learner / staff member discloses to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained. It is often easier to explain that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence.

3.8 Information Sharing & Record Keeping

Babington strongly supports the principle of working in partnership with learners and their parents/carers. This means seeking clear, explicit and informed consent from the individual(s) concerned for information about them to be shared with specified other individuals or agencies where consistent with the individual(s) best interests.

It is possible, however, to identify some circumstances in which sharing confidential information without consent will normally be justified in the public interest. These are:

- When there is evidence that the learner is suffering or is at risk of suffering significant harm.

- Where there is reasonable cause to believe that a child may be suffering or at risk of significant harm.
- To prevent significant harm arising to a learner or serious harm to learners, including through the prevention, detection and prosecution of serious crime.
- For this purpose, serious crime means any crime which causes or is likely to cause significant or serious harm to a learner.

When sharing information there are Seven Golden Rules that Babington will adhere to:

1. The Data Protection Act is not a barrier to sharing information.
2. Be open and honest.
3. Seek advice.
4. Share with consent where appropriate (there may be some circumstances where seeking consent including parental consent is not required).
5. Consider safety and wellbeing.
6. Ensure that information sharing is appropriate and secure.
7. Keep a record.

3.9 Responding to suspicions

Babington is committed to responding promptly and appropriately to all incidents or concerns that may occur and to work with statutory agencies in accordance with the procedures that are set down in '*What to do if you are worried a child is being abused.*' (DfE 2014).

We acknowledge that abuse or neglect of basic safety and welfare procedures for learners can take place and that this can take different forms - physical, emotional, and sexual as well as employer's neglect of legal responsibilities and neglect of parental or statutory responsibilities (including where learners are in care of social services).

We also acknowledge that this can take the form of 'virtual' or internet-based abuse or neglect.

We recognise that when learners are suffering from physical, sexual or emotional abuse, or may be experiencing neglect, this may be demonstrated through the things they say (direct or indirect disclosure) or through changes in their appearance or their behaviour.

All allegations or suspicions must be taken seriously. The learner or staff member must be advised that this information cannot be kept confidential and will be passed on to the On-Duty Designated Safeguarding Officer/Lead in Babington in the first instance.

3.10 Support for Staff

Where a member of staff finds a disclosure particularly distressing, they may wish to access the additional services within Babington designated health scheme or contact People and Talent Team for support.

Babington have an open-door policy for any staff who wish to discuss their concerns. Staff will need to be mindful that Babington cannot, (as with learners) give absolute confidentiality to any disclosures.

3.11 Allegations against staff

Babington recognises that whilst most staff and volunteers who work with learners are committed to their wellbeing and care there exists a range of abuse perpetrated by workers that despite the best efforts and interventions can still take place.

An allegation may relate to a member of staff including a volunteer who works with learners who has behaved in way that has harmed a learner, or may have harmed a learner, possibly committed a criminal offence against or related to a learner or behaved towards a learner in way that indicates they may pose a risk of harm to learners.

3.12 Low-level Concerns

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a learner does not meet the threshold set out in section 3.11 (Allegations

Against Staff).

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 Babington may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to safeguarding.

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

- Being over friendly with learners.
- Having favourites.
- Taking photographs of learners on their mobile phone
- Engaging with a learner on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating, or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Should an employee be identified as having behaved in an inappropriate manner that does not cause risk to a learner, People and talent should be contacted immediately.

If People and Talent are unavailable, the Chief Executive Officer should be contacted in their place.

3.13 Disciplinary action

It is a criminal offence for a person over 18 in a position of trust to groom or enter a sexual relationship with any learner under 18 years old, even if the relationship is consensual. If allegations are made against staff the same procedures as outlined above must be followed. If a member of staff suspects abuse/ grooming whether sexual or otherwise, from another member of staff, the People and Talent team must be informed. Depending on the severity of the allegations outside agencies may be informed and/or the staff disciplinary procedure may be invoked.

We abide by the DBS regulatory requirements in respect of requesting references and DBS checks for staff and we will meet the DBS reporting requirements in respect of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led to dismissal for reasons of learner protection concern. Where a member of staff or a volunteer is dismissed from the delivery of services or internally disciplined because of misconduct relating to a learner, we notify the Disclosure and Barring Service (DBS) so that appropriate action is taken.

3.14 Safer Recruitment Processes

We provide adequate and appropriate staffing resources and training to meet the needs of learners.

All staff and volunteers are informed by People and Talent that their job falls under the DBS requirements for a background check under section 128 of the Education Skills Act 2008.

We will provide the applicant with more information about the level of check required or that is relevant to their role at Babington.

There are 2 types of check:

- Standard (This check is for spent and unspent convictions, cautions, reprimands and final warnings.)
- Enhanced (This includes the same as the standard check plus any additional information held by local police that is reasonably considered relevant to the workforce being applied for (learner, child or other workforce.)
- DBS with recordings listed will be subject to a full risk assessment completed by P&T

- and signed off by Exco.
- Interviewers will be Safer recruitment trained.

3.15 Disclosures

The Staff member who receives the allegation or disclosure should make an immediate written record of the conversation, including the following information:

- Date and time of report.
- Name of Individual.
- DOB of alleged.
- Gender
- Nature of allegation.
- Any other information given, including siblings if relevant. (their full names and DOB if possible)
- Confirmation that the Learner / staff member has been advised of the next steps.

Disclosure records are held by the Safe and Sound Team/ HR Designated Safeguarding Lead and stored on a secure server. Staff must take care not to influence the outcome either through the way they speak to or question learners.

Babington continues to welcome the learner whilst investigations are being made in relation to any alleged abuse. The learner may choose to withdraw from learning activities whilst investigations take place.

We follow the procedures as set by the Safeguarding Children Partnership in relation to the delivery of services and designated roles and tasks in supporting the learner, family and employer throughout any investigation.

All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the Safeguarding Children Partnership and Local Authority Designated Officer (LADO).

4. Safeguarding definitions and guidance

4.1 Significant Harm

- Harm means ill treatment or the impairment of health or development, including impairment suffered from seeing or hearing the ill treatment of another
- Development means physical, intellectual, emotional, social or behavioural development
- Health means physical or mental health
- Ill treatment includes physical & sexual abuse and forms of ill treatment which are not physical (*s.31 (9) Children Act 1989 as amended by the Adoption and Children Act 2002*)

4.2 Welfare

Welfare is defined as a learner in need of universal help from those already involved or from a single or multiple agency response.

4.3 Missing from Education / Non-Attendance

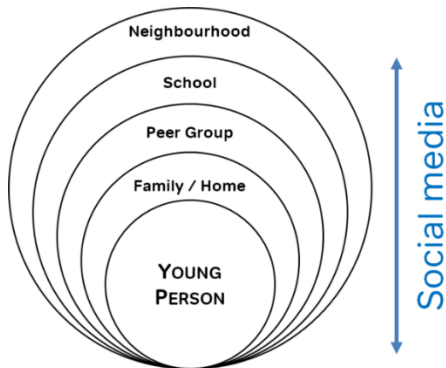
Learners who go missing from education will fail to achieve their full potential academically and fail to achieve economic wellbeing in later life. They are also at a greater risk of physical harm, self-inflicted or inflicted by others, being sexually exploited and becoming involved in crime and anti-social behaviour, being employed illegally or abusing drugs and alcohol. In line with Keeping Children Safe in Education 2025 (KCSIE), Babington take learner engagement and attendance very seriously. We have disseminated information to all our recruitment teams so that as part of ongoing and new discussions **ALL** employers will be made aware of the need to report any repeat occasions, prolonged, periods of absence and poor timekeeping concerns. It is the responsibility of employers to inform our delivery staff who will then identify the concern to the safe and sound team to investigate said concern.

4.4 Recognition of Abuse, including Neglect, Bullying and Cyber Bullying

Recognising abuse is not easy, and it is not the responsibility of staff, volunteers or learners to decide whether abuse has taken place or if there is significant risk. We do however have a responsibility to act if we think it may be happening.

Abuse, including neglect, includes forms of maltreatment of a learner. Somebody may abuse a learner by inflicting harm, by failing to act to prevent harm. Learners may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by a learner or learners, or by another learner. The DSL will undertake an annual review on our filtering and monitoring processes and strategic action plan and present this back to the Board for approval. The DSL leads on all aspects of online safety.

4.5 Contextual Safeguarding



Learners' experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child on child abuse set out below, capture the full context of the learner's experiences and identify the influences around them. This can be done by adopting a 'contextual Safeguarding' approach and by ensuring that our response to incidents of child-on-child abuse considers any potential complexity.

4.6 Types and Signs of Abuse

Abuse - may be physical, sexual or emotional abuse, or neglect.

Significant harm - ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar learner)

Physical abuse - actual or likely physical injury to a learner, or failure to prevent injury. This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a learner they are looking after. This form of physical harm is recognised as Fabricated or Induced Illness.

Sexual abuse - actual or likely sexual exploitation of a learner, including prostitution. Involving forcing or enticing a learner to take part in sexual activities without their consent or understanding, this may not necessarily involve violence. The activities may involve physical contact including penetration or non- penetrative acts. For example, it may also include involving the learner looking at or being involved in the production of, pornographic material or watching sexual activities, or encouraging the victim to behave in sexually inappropriate ways. Can include grooming a vulnerable learner in preparation for abuse.

Emotional abuse - emotional abuse is the persistent emotional ill treatment of a learner with the intent to cause severe and persistent adverse effects on the victim's emotional development. It may involve conveying to the victim that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

Age or developmentally inappropriate expectations being imposed on a learner, causing them frequently to feel frightened, or the exploitation or corruption of learners will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction.

It can include seeing or hearing ill treatment of another person. It may include serious

bullying, including cyber-bullying. It may include not giving the learner opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

Neglect - neglect is the persistent failure to meet a vulnerable learner's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting a vulnerable learner from emotional harm or danger.

Child on Child abuse – Child on Child abuse is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time. It is behaviour that intentionally hurts another individual or group either physically or emotionally. Child on child abuse is often motivated by prejudice against particular groups steered by a dislike for a person's race, religion, gender, sexual orientation, special educational needs or disabilities; or where a person is adopted or in care, has caring responsibilities, is suffering from a health problem, is frequently on the move (e.g. those from military families or the travelling community), is experiencing a personal or family crisis, has actual or perceived differences, (e.g. physical or cultural differences)

It can take many forms including serious bullying (including cyberbullying, prejudice-base bullying or discriminatory bullying), up-skirting, relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and/or gender-based violence.

Colleagues are reminded that young people (up to 19) are not always ready or able to talk about their experiences of abuse, exploitation or neglect and/or may not always recognise that they are being abused. Colleagues should always speak to the Safe and Sound team if they have concerns about a young person.

Risks/ abuse related to family/cultural belief/ faith – No religion or faith condones any form of violence or abuse against women or girls but rather that 'certain communities that practice notions of 'honour' or 'shame' may include strong values and beliefs that can cause harm'. Abuse linked to faith and belief is defined by the Metropolitan Police as,

"Abuse linked to faith or belief is where concerns for a child's welfare have been identified, and could be caused by, a belief in witchcraft, spirit or demonic possession, ritual or satanic abuse features; or when practices linked to faith or belief are harmful to a child.

Any abuse that takes place against those who are branded (or labelled) either as a witch or as having been possessed by an evil spirit is unacceptable. Significant harm (including murder) can occur because of concerted efforts to 'excise' or 'deliver' evil from a child (or vulnerable adult).

Spotting the signs that this abuse exists can prevent escalation from 'subtle' harms that may often go unnoticed by many, to 'extreme' situations where there is loss of life.

Witchcraft beliefs are used to blame a person (rather than circumstances) for misfortune that happens in life." Child abuse linked to faith or belief | Metropolitan Police

"It is important to remember that many learners are part of a family and that family members may be potential perpetrators of domestic abuse. This is particularly relevant in cases of honour-based abuse where an individual/learner could be at risk from a parent(s), sibling(s), immediate and extended family member(s)."

Bullying and Harassment - Bullying can include a variety of behaviours from one individual/ group to another individual/ group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way. Please refer to Babington's Anti-Bullying Policy for further detail.

Cyber Bullying and Online safety - The safe and responsible use of technology is sometimes presented as primarily a learner protection issue, but all need support to keep themselves safe online. The risks associated with the use of technology are vast and include internet, text or video messaging, email, chatrooms, social media networking sites, etc. used to embarrass, humiliate, threaten, intimidate, or bully an individual in an attempt to gain power and control over them. Other risks include the mismanagement of personal data, risks of financial scams, identity theft, grooming and radicalisation.

Domestic Abuse Domestic Abuse Act 2021 states "Domestic abuse is any single incident, course of conduct or pattern of abusive behaviour between individuals aged 16 or over who are "personally connected" to each other as a result of being, or having been, intimate partners or family members, regardless of gender or sexuality, Children who see, hear or experience the effects of the abuse and are related to either of the parties are also considered victims of domestic abuse". It is important to explain the impact of domestic abuse including the potential short-term and long-term detrimental impact on children's health, wellbeing, and ability to learn.

Controlling and Coercive behaviour - Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Economic Abuse - Is a legally recognised form of domestic abuse and is defined in the Domestic Abuse Act. Economic abuse means any behaviour that has a substantial adverse effect on someone's ability to acquire, use or maintain money or other property, or obtain goods or services."

Harmful practises:

Harmful cultural practices are a collective term for a number of different forms of abuse which will all share a similar characteristic, that they are seen as acceptable practises within some sections of society. Below are some examples.

[Guidance for Schools | Schools Charter \(theschoolscharter.co.uk\)](https://theschoolscharter.co.uk)

Female Genital Mutilation (FGM) – Is recognised under the definition of Domestic abuse. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that females at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires staff to report any disclosure directly to the Police and the DSL where, during their professional duties, they either are informed by a female under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a female under 18 and they have no reason to believe that the act was necessary for the female's physical or mental health or for purpose with labour or birth. For the purposes of the duty, the relevant age is the female's age at the time of disclosure/identification of FGM (i.e., it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18).

Honour Based Abuse (HBA)- Is recognised under the definition of Domestic Abuse. An incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may

have been committed to protect or defend the honour of an individual, family and/ or community for alleged or perceived breaches of the family and/or community's code of behaviour. Warning signs for HBA can be:

- Acting withdrawn or upset / fear of going home.
- Bruising or other unexplained physical injury.
- Depression, self-harming or attempted suicide.
- Unexplained absence or poor performance at school or work.
- Their movements are strictly controlled / constantly chaperoned.
- Family rows, domestic violence.
- Behavioural changes.
- Running away from home.
- Technology withdrawn.
- A family history of relatives going missing.

Forced Marriage - One or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. When a person does not consent or is unable to assent, there is a lack of full and free consent (if they have learning disabilities or a mental health need, for example). A clear distinction must be made between a forced marriage and

an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the person. From 2023 new laws within England now make it illegal for a child to marry before their eighteenth birthday.

Incels - Incels or Involuntary celibates, are heterosexual men who are being radicalised online and blame women and society for their own inability to form romantic or sexual attachments. Incels are the most violent element of the manosphere, with rape, violence and even murder justified to draw attention to the "problem" of sexually frustrated young white males. It shares some similarities with the better-known alt-right movement, with both groups attributing society's ills to social liberalism, women and ethnic minorities. Acid attacks are a popular suggestion for retribution since they usually result in physical disfigurement and the sexual enslavement of women is also advocated to ensure "fair" distribution of sex.

Modern slavery - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

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

Serious Crime - Serious and organised crime includes drug trafficking, human trafficking, organised illegal immigration, child sexual exploitation, high value fraud and other financial crime, counterfeiting, organised acquisitive crime and cyber-crime.

Sexting - This is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics' or 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

Once the image is taken and sent, the sender has lost control of the image, and the image

could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many people are not aware that they could be committing a criminal offence under the Sexual Offences Act 2003.

Any direct disclosure by a learner (male or female) will be taken very seriously. A learner who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort, and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to our attention, we will follow the guidance as set out in the UKCCIS publication *Sexting in Schools and Colleges: Responding to incidents and Safeguarding learners*.

Sexual violence and Sexual Harassment between learners - Sexual violence and harassment can occur between two learners of any age or gender or when a group of learners sexually assaults or harasses a single learner or a group of learners. Sexual violence and sexual harassment may overlap and can occur on-line and off-line (both physical and verbal). Sexual violence includes offences under the Sexual Offences Act 2003 (rape, assault by penetration and sexual assault).

Consent is defined as the ability to choose freely. Consent to sexual activity can be provided for one type of sexual activity but not for another, and it can be revoked at any time during the action and each time it takes place.

Sexual harassment is unwelcome sexual behaviour that is likely to violate a learner's dignity, intimidate, degrade, or humiliate them, and/or create a hostile, offensive, or sexualised environment. It can happen both online and offline. Sexual remarks, such as telling sexual stories; lewd remarks; sexual remarks about clothes and appearance; calling someone sexualised names; sexual "jokes" or taunting; deliberately brushing against someone; interfering with someone's clothes; or displaying pictures, photos, or drawings of a sexual nature are all examples some of which may be deemed low level sexualised concerns.

Sexual harassment on the internet can occur on its own or as part of a larger pattern of sexual harassment and/or sexual assault. Non-consensual sexual image and video sharing, sexualised online bullying, unwelcome sexual comments, and messages (including on social media), sexual exploitation, coercion, and threats, and up-skirting are all examples. If staff have a concern about a learner or a learner makes a report to them which relates to child-on-child sexual violence and/or sexual harassment, Harmful sexual behaviour (HSB) is **developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive**. Child on Child sexual abuse is a form of HSB where sexual abuse takes place between children of a similar age or stage of development. The DSL will review and record all sexual harassment concerns including low levels concerns using Hackett's continuum and seeking support from external agencies when and as needed.

Hackett's continuum of sexualised behaviours.

| Normal | Inappropriate | Problematic | Abusive | Violent |
|---|--|--|---|---|
| <ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making | <ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal | <ul style="list-style-type: none"> • Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity | <ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure victim compliance • Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence | <ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is physiologically and/or sexually arousing to the perpetrator • Sadism |

Initiation/Hazing - Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

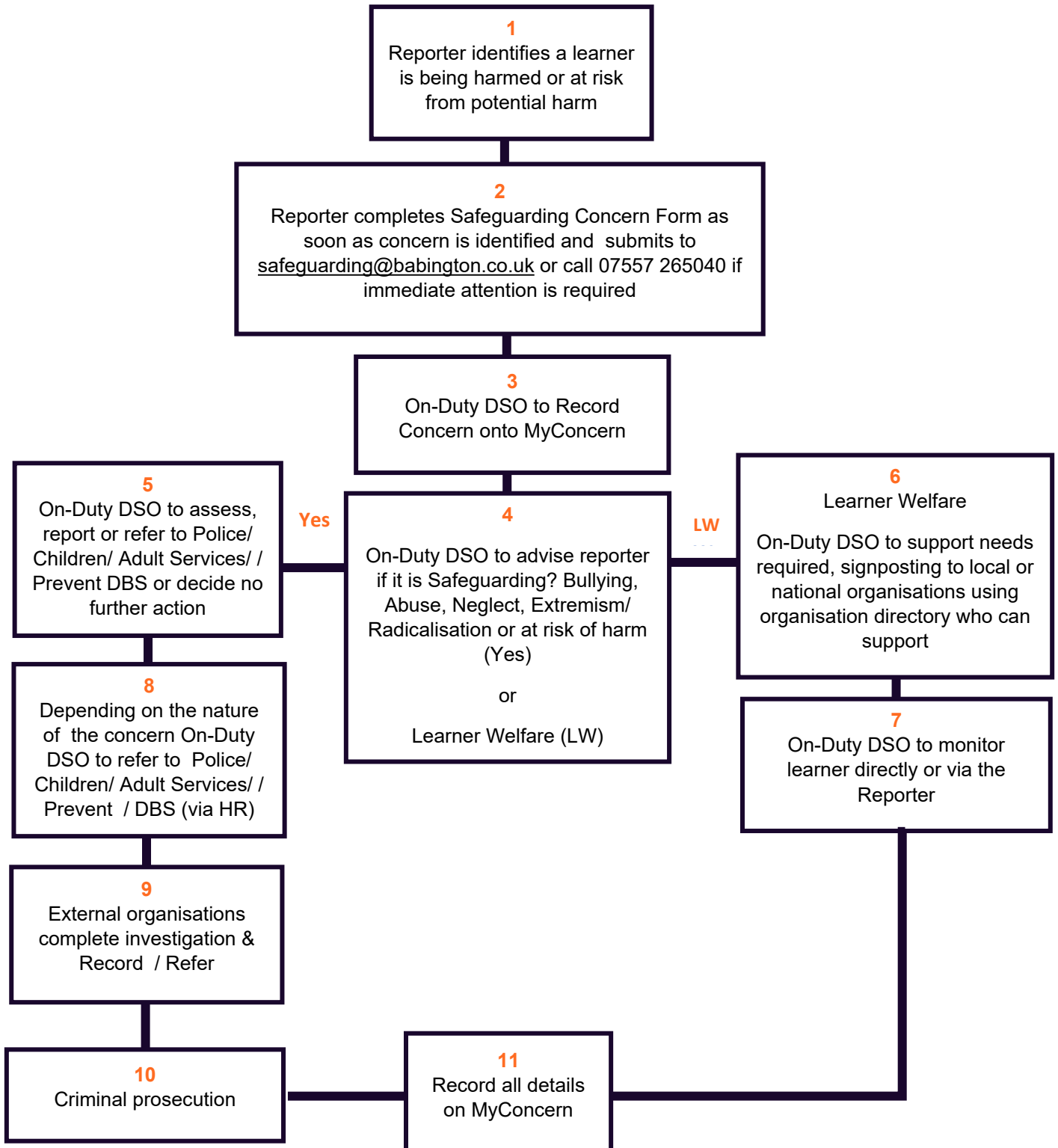
Hazing is seen in many different types of social groups, including gangs, sports teams and educational groups. The initiation rites can range from relatively benign pranks, to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct. Hazing may include physical or psychological abuse. It may also include nudity or sexual assault.

Upskirting - Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is now a specific criminal offence in England and Wales. It can take place in a range of places, e.g., British Transport Police have seen a rise of reports on public transport. The law captures instances where the purpose of the behaviour is to obtain sexual gratification or to cause humiliation, distress, or alarm. Perpetrators will now face two years in prison with the most serious offenders being placed on the sex offenders' register. Criminalising this distressing practice aims to deter people from committing the crime.

5. Safeguarding & Prevent Referral Flowchart

5.1 Safeguarding/ Prevent Referral Grid

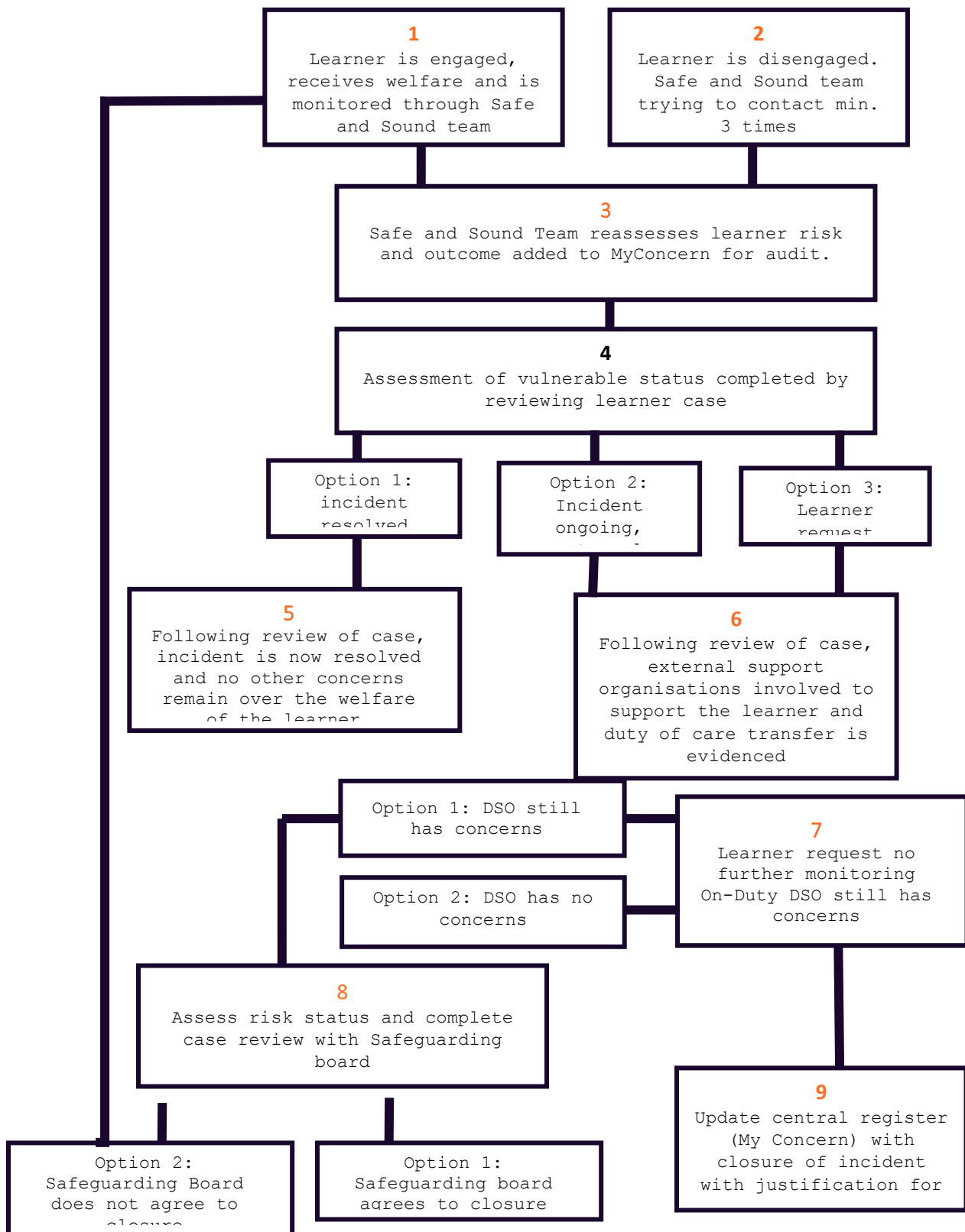
| | Process | Responsibility | Action |
|--|---------|----------------|--------|
|--|---------|----------------|--------|



*Debrief and support for staff at any time throughout the process

| | | | |
|----|--|--|---|
| 1 | Reporter identifies a learner is being harmed or at risk from potential harm | Reporting Officer | Move to step 2 |
| 2 | Reporter completes Safeguarding Concern Form and submits to safeguarding@babington.co.uk by close of play the same day or call 07557 265040 | Reporting Officer | Move to step 3 |
| 3 | On-Duty DSO to Record Concern onto MyConcern | On-Duty DSO | Move to step 4 |
| 4 | On-Duty DSO to advise reporter if it is Safeguarding? Bullying, Abuse, Neglect, Extremism/ Radicalisation or at risk of harm? Option 1 -Yes Option 2 -Learner Welfare (LW) | On-Duty DSO | Option 1 Move to step 5 Option 2 Move to step 6 |
| 5 | On-Duty DSO to assess, report or refer to Police/ Prevent using national referral form /Children/ Adult Services/ DBS or decide no further action | On-Duty DSO | Move to step 8 |
| 6 | On-Duty DSO to support needs required, signposting to local or national organisations using organisation directory who can support | On-Duty DSO | Move to step 7 |
| 7 | On-Duty DSO to monitor learner directly or via the Reporter, completing monthly welfare updates (minimum) Option 1 -satisfied appropriate support is in place; close the case Option 2 –requires reassessment | On-Duty DSO | Option 1- Move to step 11 Option 2- move to step 4 |
| 8 | Depending on the nature of the concern On-Duty DSO to liaise or refer to Police/ Children/ Adult Services/ Prevent / DBS (via HR) for external assessment & support | On-Duty DSO | Move to step 9 |
| 9 | External organisations complete investigation & Record. On-Duty DSO to continue to monitor the learner throughout the Investigation for welfare support until and outcome is deemed. Outcome 1: no further action Outcome 2: Prosecution | On-Duty DSO | On-Duty DSO to record all details on MyConcern |
| 10 | Criminal prosecution | External Organisations | DSL to record outcome onto learner file |
| 11 | Record all details on MyConcern | On-Duty DSO | Any new/additional information, restart process again |
| * | Debrief and support for staff at any time during the process | Safe and Sound Manager / External Support organisation | Internal support as well as external signposting and support given to staff as required |

6. Incident Closure Flowchart



| 6.1 Incident Closure Grid | | | |
|----------------------------------|---|--|---|
| No. | Process | Responsibility | Action |
| 1 | Learner is engaged, receives welfare and is monitored through Safe and Sound team | Reporting Officer/ On-Duty DSO | Move to step 3 |
| 2 | Learner is monitored but disengaged. Safe and Sound team/Reporter will try to contact learners on 3 instances. These methods of contact must consist of either; phone, text and email. | Reporting Officer | Move to step 3 |
| 3 | Reassess learner risk and outcome added to MyConcern for audit. | On-Duty DSO | Move to step 4 |
| 4 | Assessment of vulnerable status completed by reviewing learner case. Outcome of 3 possible options: Option 1 – Incident resolved Option 2 – Incident ongoing, external support invoked. Option 3 – Learner request closure | On-Duty DSO | Option 1 – move to step 5 Option 2 – move to step 6 Option 3 – move to step 7 |
| 5 | Following review of case, incident is now resolved, and no other concerns remain over the welfare of the learner. | On-Duty DSO | Move to step 9 |
| 6 | Following review of case, external support organisations involved to support the learner and duty of care transfer is evidenced | On-Duty DSO | Move to step 9 |
| 7 | Learner request no further monitoring. Option 1: If On-Duty DSO still has concerns Option 2: If DSO has no concerns | On-Duty DSO | Option 1 - move to step 8 Option 2 - move to step 9 |
| 8 | Assess risk status and complete case review with Safeguarding board Option 1: Safeguarding board agrees to closure Option 2: Safeguarding Board does not agree to closure; return to monitoring | On-Duty DSO & Safeguarding Board | Option 1: move to step 9 Option 2: move to step 1 |
| 9 | Update central register (My Concern) with closure of incident with justification for closure. | On-Duty DSO | No further Action |
| * | Debrief and support for staff at any time during the process | Safe and Sound Manager / External Support organisation | Internal support as well as external signposting and support given to staff as required |

7 Anti-Bullying

Babington is committed to learners and staff's right to learn/ teach in an environment that is safe and free from discrimination and bullying.

The Education and Inspections Act 2006 requires that every educational institute must have measures to encourage good behaviour and prevent all form of bullying (including Cyber bullying) amongst pupils. FE and non- statutory Colleges are not subject to this Act; however, this policy has been developed in accordance with the spirit of the Act and following Department for Education (DfE) guidelines on Preventing and Tackling Bullying.

The Equality Act 2010 requires colleges to comply with the public-sector equality duty. This policy takes those requirements into account. Babington's Equality Scheme and Safeguarding Policies are relevant to this policy.

The Education Act 2011, Education (Scotland) Act 2016, and Education Act (Northern Ireland) 2014 places a duty on education and training provisions to safeguard and promote the welfare of children and adults. Safeguarding encompasses bullying and all principles are applicable to all. Babington aims to promote a common understanding of what constitutes bullying, the measures we take to prevent bullying and the intervention and support strategies it uses once bullying is reported.

This policy applies to all staff, including senior managers, the Board, paid staff, volunteers and seasonal workers, agency staff, learners or anyone working for and on behalf of Babington. The term 'learner' used in this policy refers to learners of Babington who attend interviews, study at our centres or in their place of work.

We have a zero-tolerance approach to bullying at Babington. Babington will challenge bullying in all its forms and take quick clear and decisive action to protect learners and staff. We are committed to creating an environment which supports staff and learners to report and challenge bullying and which encourages positive intervention to prevent the occurrence of bullying. We ensure that all learners and staff have clear access to our Complaints Policy and procedures.

Definition of Bullying

Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening, or undermining someone. It can happen anywhere – in education, at home or online. It is usually repeated over an extended period and can hurt a child or adult both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is referred to as cyberbullying. A learner can feel like there is no escape because it can happen wherever they are, at any time of day or night.

Bullying includes:

- Verbal abuse, such as name calling and gossiping.
- Non-verbal abuse, such as hand signs or text messages.
- Emotional abuse, such as threatening, intimidating, or humiliating someone.
- Exclusion, such as ignoring or isolating someone.
- Undermining, by constant criticism or spreading rumors.
- Controlling or manipulating someone.
- Racial, sexual or homophobic bullying also known as prejudice-based and discriminatory bullying.
- Physical assaults, such as hitting and pushing.
- Making silent, hoax or abusive calls.
- Online or cyberbullying.

Cyberbullying

The NSPCC states that 'Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, mobile phones and online games. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Learners may know who is bullying them online – it may be an extension of offline peer bullying - or they may be targeted by someone using a fake or anonymous account. It is easy to be anonymous online and this may increase the likelihood of engaging in bullying behaviour. Cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - so it can feel like there's no escape'.

Signs of Bullying

There are usually signs when an individual is being bullied. These can include.

- Changes in Character i.e., being nervous, losing confidence, or becoming distressed and withdrawn.
- Changes in appearance.
- Attendance issues.
- Unexplainable injuries.
- Lost or destroyed personal items i.e., clothing, books, electronics, or jewellery.
- Frequent headaches or stomach aches, feeling sick or faking illness.
- Changes in eating habits, like suddenly skipping meals or binge eating.
- Difficulty sleeping or frequent nightmares.
- Sudden loss of friends or avoidance of social situations.
- Feelings of helplessness or decreased self-esteem.
- Self-destructive behaviours such as running away from home, harming themselves, or talking about suicide.

Preventing bullying

Babington aims to prevent bullying before it occurs. We have created a list of strategies that can be used to do this.

- Learners learn about respect and bullying, citizenship, equality, diversity and inclusion and social justice in group settings within Babington centres. Tutors will also deliver this content within sessions with 1:1 learners around cultural events and the celebration of diversity. Babington ensures that teaching staff promote skills such as teamwork, empathy, resilience throughout the curriculum.
- Babington identifies learners who are vulnerable and/or at risk of disengagement or underachievement. These learners are monitored closely so early interventions can be put in place to prevent issues from escalating and Babington's Customer Support and Safe and Sound Team offers support and guidance throughout.
- We can signpost to external support agencies for any learner or staff members. Babington stores a directory of services on its Intranet for national or area-based services.
- All staff receive mandatory Safeguarding training which covers in depth aspects such as bullying and harassment.
- Anti-Bullying Week, Equality, Diversity and Inclusion Month and Stay Safe Month are an established part of Babington's diversity/ cultural events calendar and embedded into the curriculum.
- All staff and learners are encouraged to adopt a Restorative Approach to resolve conflict and to build good relationships.
- Expectations are made clear to learners and staff at induction and are expected to sign a contract of agreement around behaviour and conduct.
- At Babington, we promote and work in partnership with learners to help them share their voice and experiences. These views are captured in our surveys and questionnaires.

All reports of bullying will be taken seriously and addressed as quickly as possible.

It is the responsibility of Babington staff to determine the nature and extent of the bullying and act appropriate to the circumstance.

Once a report of bullying is received a member of staff will meet/ contact the individual/s being bullied to discuss the circumstances and severity of the bullying.

When Babington believes that bullying has occurred, it will be dealt with as a disciplinary matter through the disciplinary process. (Please see the below process flowchart). The disciplinary process considers the needs of vulnerable learners including those responsible for bullying.

Anonymity cannot always be guaranteed as we have a duty to act to protect and safeguard learners, but every effort will be made to deal sensitively with the issue/s.

If the person making the allegation is dissatisfied about with how it has been dealt with, they have the right to appeal through the Babington's Complaints Procedure. Staff at Babington are expected to work with and support those responsible for bullying to understand the impact of their behaviour.

Learners with a Learning Difficulties, Disability and LGBTQ

Learners or staff with learning difficulties, disabilities or who may be LGBTQ may be especially vulnerable to bullying or have difficulties in communicating. At Babington, staff are skilled, experienced and they work closely with learners so they can identify signs at an early stage. Any reports of a learner with a learning difficulty and/or disability being bullied will involve the Safe and Sound Manager.

Responsibilities and Roles

Lead Staff

- The Senior Management Team and Safe and Sound Manager are to regularly review, update and implement this policy.
- The DSO will record all incidents in line with our safeguarding process flow and provide appropriate support.
- Operational Business Managers and teaching staff have a responsibility to assess allegations thoroughly and to seek to resolve conflict. This may be working in partnership with The People and Talent team or Safe and Sound Team.
- Teaching, centre-based staff and Safeguarding Staff have responsibility to support learners through any investigation into an allegation of bullying and/or harassment.

Staff are responsible for:

- Being aware Bullying and the procedures for reporting bullying (through the Safeguarding report form).
- Acting in line with this policy should they witness acts of bullying or harassment; or are approached in confidence by learners being bullied or harassed; or by learners who have witnessed such actions.
- Treating all learners and colleagues with dignity and respect, ensuring their own conduct does not cause offence or misunderstanding; and challenging behaviour or the use of language which could cause offence.
- Role modelling behaviours which promote mutual respect and tolerance.

Learners

Learners are required to:

- Follow the Learner Agreements that are put in place by induction processes and the Safe and Sound Learner Handbooks
- Report incidents of bullying
- Support their peers and wherever possible adopt a restorative approach.

Parents/Carers

Babington expects parents and carers to contact us if they know or suspect their son/daughter is being bullied or is bullying others. It is also expected that parents/carers will work with Babington staff to resolve conflicts between learners if required.

Linked Documents

This policy should be read in conjunction with the following policy's

- Online safety policy
- Whistle Blowing Policy.
- Code of Conduct.
- Grievance Procedure.
- Disciplinary Procedure.
- Appeals Procedure.
- Confidentiality Procedure.
- Information security handbook.
- Online safety policy.
- Social Media policy.
- Dignity at Work Policy.
- Talent acquisition and induction policy.
- Complaints Procedure.

Anti-Bullying Help lines and organisation Help Lines:

Childline Phone: 0800 1111

NSCPCC Phone: 0808 800 5000

Family Live: Phone: 0808 800 2222

Respect Me – 0344 800 8600 (Scotland)

Organisations/ web sites:

Anti-Bullying Alliance: <http://www.anti-bullyingalliance.org.uk/>

National Society for the Prevention of Cruelty to Children (NSPCC): <http://www.nspcc.org.uk/>

ChildLine: <http://www.childline.org.uk/Pages/Home.aspx>

Kidscape: <http://www.kidscape.org.uk/>

Family Lives: <http://familylives.org.uk/>

Respect Me: <https://respectme.org.uk/>

Guest and Visiting Speakers Policy

Introduction

Babington is committed to learners and staff's right to learn and teach in an environment that is safe. We often invite speakers from the wider community to give talks to enrich our learners' experience, whether face to face or online, providing them with information that helps them make decisions at different phases of their learning, widening their understanding of world and global issues and providing motivational inspiration through the sharing of a speaker's experience.

Our responsibility to our learners is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of Babington and fundamental British values.

The 'Prevent' statutory guidance educational establishments to have clear protocols for ensuring that any guest and visiting speakers whether invited by staff or learners, are suitable and appropriately supervised.

The protocols are:

- All visiting speakers to have a nominated point of contact during face to face or online delivery (the Organiser).
- All requests for outside speakers require the prior approval of the Manager or Safe and Sound Manager
- Obtaining an outline of what the speaker intends to cover in advance of their visit.
- Conducting research on the person/organisation to establish whether they have demonstrated extreme views/actions.
- Refusal to allow people/organisations to use Babington premises or online space if they have links to extreme groups or movements. Justification of Babington's decision will be provided to the person/organisation in writing.
- Visiting speakers sign the 'Agreement and Guidelines for Visiting Speakers' form as acceptance of Babington's terms and conditions.
- Conducting a risk assessment in relation to the Prevent Duty.
- Maintaining a formal register of all guest/ visiting speakers.
- Ensuring guest/ visiting speakers are accompanied at all times at centres or online and are not left unsupervised with learners at any point.
- Conducting a post-event evaluation of how the visit/ online delivery met the needs of our learners.

Babington's Guest and Visiting Speakers Policy links to the following:

- Safeguarding and Prevent Policy
- Equality, Diversity and Inclusion Policy

Please ensure you provide your guest / visiting speaker with a copy of the relevant policies. All completed Guest and Visiting Speakers Agreement and Guideline (Appendix 1), and Risk Assessment for Guest and Visiting Speakers (Appendix 2) and presentation material must be approved by a Manager or the safe and sound team prior to confirmation with the Guest/ Visiting Speaker. It must then be submitted to safeandsound@babington.co.uk where the guest/visiting speaker will be added to the approved list of speakers.

8.1 Appendix 1: Guest and visiting speakers risk assessment

| | |
|---|---------------------------|
| Provider/Sub contractor: | |
| Delivery location: | Session date/s: |
| Learner group/s: | Intent |
| Staff organiser | Approving Manager: |
| Age Range of Participants: <input type="checkbox"/> under 19 <input type="checkbox"/> over 19 <input type="checkbox"/> mixed age group | |

| External Speaker / Trainer details | | |
|---|--------------------------|--------------------------|
| <i>Name:</i> | <i>Address:</i> | |
| <i>Tel no:</i> | <i>Email:</i> | |
| <i>Employing organisation (where applicable):</i> | | |
| Assessment | Yes | No |
| 1. Has the speaker previously been barred from speaking either internally or externally, or previously been known to express views that may be in breach of the External Speaker Code of Conduct? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Does the proposed theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the Safeguarding and Prevent Policy? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Has the invited Guest Speaker had an internet and social media account search in line with KCSiE 2022/2023? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Has the presentation been vetted for age appropriate, harmful, inciting hatred / violence content. | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Is the presentation in line with the Prevent Duty? The speaker must be aware that extreme / harmful content and narrative is not permitted. | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Is the speaker aware that they are not permitted to raise or gather funds for any external organisation. | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Does the speaker understand that Babington have the right to interrupt / stop the presentation at any time for any violation of this agreement. | <input type="checkbox"/> | <input type="checkbox"/> |
| Risk assessment | | |
| <i>If required, has a DBS check been obtained?</i> | <input type="checkbox"/> | <input type="checkbox"/> |
| <i>Have any training materials or resources been checked and vetted?</i> | <input type="checkbox"/> | <input type="checkbox"/> |
| <i>Has the Safeguarding and Prevent policy been explained?</i> | <input type="checkbox"/> | <input type="checkbox"/> |
| Declarations and Agreement | | |
| Event organiser: I confirm that an appropriate risk assessment has been carried out. | | |
| <i>Name:</i> | <i>Signature:</i> | <i>Date:</i> |
| External speaker: I confirm that I will comply with the External Speaker Code of Conduct | | |
| <i>Name:</i> | <i>Signature:</i> | <i>Date:</i> |

| | | |
|--|------------|-------|
| S&S Manager/DSL Approval: I confirm that I have approved the arrangements as set out above. | | |
| Name: | Signature: | Date: |

Appendix 2: Sample Risk Assessment for Guest and Visiting Speakers

In order to preserve the reputation of Babington and to maintain a clear focus on our main priority of teaching and learning within a safe and sound environment, Babington have to ensure the speakers and topics of events are appropriate.

Please complete the Risk Assessment and provide the Safe and Sound team with any additional information which can help with the assessment.

| Describe the hazard & how it can cause harm | Who might be harmed and how? | Existing control measures | Risk Rating Likeliness x Severity = RR | | | Additional control measures | Revised rating Likeliness x Severity = RR | | |
|--|------------------------------|---|---|---|----|--|--|---|----|
| | | | L | S | RR | | L | S | RR |
| Cables and wires could act as trip hazards, leading to both minor/serious injuries. | Learners and speaker | Cables and wires to be kept to a minimum. Any charging cables to be kept away from paths and stairs. All involved will be responsible for ensuring that paths are cleared of cables and wires. | 2 | 2 | 4 | What additional control measures could you put in? Will these measures decrease likelihood and/or severity? | | | |
| Overcrowding in rooms could lead to problems when evacuating (i.e. Fire Alarm). | Any learner or speaker | Babington control measures – No smoking stipulation - fire exits - emergency contact – location of extinguishers. Event organiser to ensure that room capacity is not breached and monitor headcount throughout the event. | 2 | 3 | 6 | | | | |
| Content of Presentation may cause offense to some learners or be deemed inappropriate. | Any learner | Guest and Visiting Speakers Agreement and Guideline form to be filled out before the event, in line with Babington's Guest and Visiting Speaker policy. | 1 | 1 | 1 | | | | |

| Describe the hazard & how it can cause harm | Who might be harmed and how? | Existing control measures | Risk Rating Likeliness x Severity = RR | | | Additional control measures | Revised rating Likeliness x Severity = RR | | |
|---|------------------------------|---|---|---|----|-----------------------------|--|---|----|
| | | | L | S | RR | | L | S | RR |
| Safeguard learners' privacy for online delivery | Any learner | All learners to be given advice and guidance on how to protect themselves online Learner to ensure they have the correct Anti-virus/ spyware when using online platforms | 1 | 1 | 1 | | | | |

Risk Banding

| | | | | | | | | | | |
|-------------------------|--------------|----------------------|------------------------|--|---------------------------------------|-------------|-----------------|------------|----------------|--------------|
| Date: | Assessed By: | Manager's Signature: | Department / Location: | Risk Matrix – High – Medium – Low (Risk) | | | | | | |
| | | | | Severity x Likelihood = Risk Rating | | Likelihood | | | | |
| | | | | | | Certain (5) | Very Likely (4) | Likely (3) | May happen (2) | Unlikely (1) |
| What Is Being Assessed: | | | | Severity | Death (5) | 25 | 20 | 15 | 10 | 5 |
| | | | | | Major Injury (4) | 20 | 16 | 12 | 8 | 4 |
| | | | | | Over 7-day Injury (3) | 15 | 12 | 9 | 6 | 3 |
| | | | | | Minor Injury – Treatment off site (2) | 10 | 8 | 6 | 4 | 2 |
| | | | | | Minor Injury – First aid on site (1) | 5 | 4 | 3 | 2 | 1 |
| Review Date: | | | | | | | | | | |

9. Emergency Response Lockdown Policy and Procedure

1. Summary

This document outlines the actions to be taken in the event of an Emergency Response Lockdown being activated. Emergency Response Lockdown is a sensible and proportionate response to any external or internal incident which has the potential to pose a threat to the safety of staff, learners, and visitors. The aim of an emergency response lockdown is to prevent people moving into the danger areas and preventing or frustrating any potential attackers accessing a site. This will ensure that staff, learners, and visitors are safe in situations where there is a hazard on the premises or outside in the near vicinity.

This document will be published on Babington Hub, and should be read in conjunction with the following documents:

- Health and Safety Policy including evacuation procedures.
- Safeguarding and Prevent Policy.
- Business Continuity Plan.

An emergency response lockdown is activated when there is a serious security risk to the site and the occupants due to, for example:

- Near-by chemical spillage.
- Near-by hazard.
- Attempted access by unauthorised person's intent in causing harm/damage.
- Terrorist/extremist attack.

In all such circumstances, staff must follow any instructions from the Emergency Services, irrespective of whether an emergency response lockdown has been activated or not, if the advice is to evacuate the building, then these instructions will take precedence.

Babington will employ two types of emergency response lockdowns, '**Partial**' and '**Full**'.

2. Partial Emergency Response Lockdown

In a partial emergency response lockdown, staff, learners and visitors should remain in the building and all doors leading outside of the Babington boundary should be locked. No one should be allowed to enter or leave the building; however, teaching and work can continue as usual. This may be as a result of a national security alert, reported incident / civil disturbance in the local community with the potential to pose a risk to the occupants on site. It may also be as a result of a warning being received regarding the risk of air pollution, etc.

3. Partial Emergency Response Lockdown Immediate Action

- All staff, learners and visitors remain in building and external doors and windows are locked.
- Free movement may be permitted within the building dependent upon circumstances.
- In the event of an air pollution or chemical, biological or radiological contaminants issue, air vents, fans, heating and air conditioning systems should be closed or turned off.
- Use anything to hand to seal up all the cracks around doors and any vents into the room – the aim is to minimise possible ingress of pollutants, and
- Staff should await further instructions.

There needs to be a means of communicating the alert to staff and learners at break times, as depending on the location depends on where they take their breaks, as they may be outside of the boundary of the location.

4. Full Emergency Response Lockdown

This signifies an immediate threat to the site and the occupants and may be an escalation of a partial emergency response lockdown. The aim of a full emergency response lockdown is for the location and its rooms to appear empty.

5. Full Emergency Response Lockdown Immediate Action

- All training staff, learners and visitors should stay in their training room or move to the nearest one.
- Office staff and visitors should remain in their office.
- External doors locked. Training room and office doors locked (where a member of staff with key is present).
- Windows locked, blinds drawn, internal door windows covered (so an intruder cannot see in).
- Staff, learners, and visitors sit quietly out of sight and where possible in a location that would protect them from gunfire (bullets go through glass, brick, wood and metal. Consider locations behind substantial brickwork or heavy reinforced walls).
- Lights, smartboards and computer monitors, etc. turned off.
- Mobile phones turned off (or at the least turned onto silent so they cannot give away your position).
- A register to be taken of all staff, learners and visitors in each training room/office – ensure that local Visitor Procedures are adhered to.
- Communicate register of staff, learners and visitors to a pre-agreed central office.
- Staff should await further instructions.

6. Planning for an Emergency Response Lockdown

Advanced planning of what needs to be done to lockdown a site whilst recognising the need for flexibility in those plans. Planning should consider:

- How to achieve effective emergency response lockdown.
- How to let people know what is happening.
- Training staff.
- STAY SAFE principles – [click here for link to Stay Safe video](#).
- How to respond to an attack – Run, Hide and Tell.

It is not possible to prescribe a generic emergency response lockdown plan as there are a number of variables that will dictate exactly how an individual location responds to those situations identified, for example:

- Access to alarm controls.
- Other means of internal communications - messenger, two-way radios, mobile phone, internal e-mail, texts etc.
- Location site plan e.g., the layout of buildings and their proximity to one another.
- Age of learners.
- Geographical location – urban/rural, presence of secure perimeter fence.

7. Emergency Response Lockdown Plan

Due to the fast-moving nature of incidents that require an emergency response lockdown, whether it is a FULL or PARTIAL lockdown, it is important that all staff can act quickly and effectively.

Staff should have clear roles and responsibilities.

A lockdown drill should be undertaken at least once a year and thoroughly debriefed to monitor the effectiveness of the arrangements.

Parents/guardians/employers should know that the location has a lockdown plan, but it should never be shared with non-employees.

Emergency response lockdown arrangements should be determined by each location on an individual basis, as they will be dependent to a large extent on local circumstances such as:

- Designation of the location – is it offices, or offices and training.
- Whether the location is single occupancy, by which is meant only Babington staff are working from the premises.
- Whether it is a multi-occupancy location, with several different tenants.
- Premises design and layout.
- Training room and office arrangements.
- Resources available.

However, the following basic principles should be included in each location's plan:

- A member of staff onsite will initiate, manage, and conclude the lockdown under direct supervision from the Safe and Sound Manager and Health and Safety officer. They will also communicate with emergency services.
- Staff are alerted to the activation of the plan by a recognised signal, audible throughout the building and the confines of the perimeter.
- **The use of the fire alarm should be avoided to reduce the incorrect response to an incident.**
- Learners/staff who are outside of the buildings should be brought inside as quickly as possible.
- Those learners/trainers inside the building should remain in their training room or proceed directly to the nearest training room.
- Other staff and any visitors inside the building should remain in their office or proceed directly back to their office.
- All external doors and, as necessary, windows are locked (depending on the circumstances, internal doors may also need to be locked).
- Blinds/curtains drawn and windows on internal doors covered.
- Once in lockdown mode, staff should notify the H&S officer and DSL immediately of any staff/learners or visitors not accounted for and any additional staff/learners/visitors in their training room or office via the agreed communication channel.
- Staff should encourage the learners and visitors to keep calm.
- As appropriate, the location should establish communication with the Emergency Services as soon as possible.
- The Director responsible for the Location should be notified at the earliest opportunity or if unavailable their Deputy via the agreed communication channel.
- If necessary, parents/guardians and next of kin should be notified as soon as it is practicable to do so via Babington's established communications system.
- Learners must not be released to parents/guardians, etc. or let off the premises during an emergency response lockdown.

If it is necessary to evacuate the building, the fire alarm should sound.

- Ensure procedures are in place for members of staff who do not have a regular office or training room.
- Ensure visitors and peripatetic staff are included in your centre/location emergency response lockdown plan.
- Establish an official emergency response lockdown termination announcement/signal so that all staff know that it is authentic.
- Specific arrangements should be made for learners/staff/visitors with different needs (i.e., hearing/visual impairment or mobility needs – please refer to/ complete the Personal Emergency Evacuation/ Lockdown Plan).
- Areas in the centre/location that cannot be effectively locked down should be identified and the emergency response lockdown procedures should include instructions on removing staff and learners from these areas to a place of safety (i.e. toilets/outbuildings).
- Establish agreed methods of communication from staff to the emergency response lockdown manager should a dangerous intruder be located on the premises.
- An overview sheet outlining the location/centres procedures will be displayed in the location as appropriate.

Staff, learners and visitors should remain in lock down until it has been lifted by a senior member of staff or by the emergency services. If at any point during the emergency response lockdown, the fire alarm may sound, this is a cue to evacuate the building.

During the lockdown, staff will keep agreed lines of communication open but not make unnecessary calls to the central office as this could delay more important communication.

Examples of discreet communication channels might be:

- Where staff have access to an internal e-mail system, they could access their account and await further instruction. In practical terms, staff would need to be familiar with accessing their account through a variety of means e.g. laptop, smartphone or tablet.
- Alternatively, WhatsApp could be employed and set-up a group messaging system.

8. Emergency Services

It is important to keep lines of communication open with Emergency Services as they are best placed to offer advice as a situation unfolds. The site may or may not be cordoned off by Emergency Services depending on the severity of the incident that has triggered the lockdown. Emergency Services will support the decision of the Tactical/Strategic Lead with regarding the timing of communication to parents and/or guardians.

In the event of a prolonged emergency response lockdown or more severe scenario, emergency services, local authorities and voluntary sector organisations will work together to co-ordinate practical and emotional support to those affected by any emergency.

9. Roles and Responsibilities

- **Emergency Response Member of staff** – to activate emergency response lockdown, ensure everyone is fulfilling their roles, inform the Safe and Sound Manager and senior management of the immediate threat to the site.
- **Emergency Services/Local Authority Liaison Person** – Safe and Sound Manager to act as first point of contact for the information to be delivered to the site in the event of an emergency/event being called by the Emergency Services or the Local Authority
- **Key manager** – this is to ensure that all staff using the Training Rooms/Offices/Meeting facilities have signed out a key to enable the door to be locked in the event of lockdown being activated.
- **Tactical Lead** – senior manager to give instructions to the Operational Lead in relation to what they need to do, and to pass relevant information in relation to what is happening external to the lockdown site.
- **Strategic Lead** – to make the executive decisions in relation to the lockdown, and if required to ensure that any communications required to be made public, contain the relevant facts, etc.
- **Communications Officer** – to act as liaison between Babington and local/national media including social media.

10. Shared Buildings

For multi occupancy sites, methods of communication between all businesses need to be considered. Under the Protect duty we will follow any directive set out by the owner of said building in response to their preparedness plan.

Summary Must Do's and Don'ts:

- | | |
|--|---|
| 1. Do learn the Lockdown Procedures. | 5. Do carry out emergency response lockdown drills & desktop exercises. |
| 2. Do learn the office/training room layouts, particularly the entry and egress points. | 6. Do NOT release full copies of the Lockdown Policy and/or Procedures To anyone outside of the Company. |
| 3. Do know on a day-to-day basis, who is in the facility – includes staff, learners and visitors. | 7. Do NOT panic in front of learners or visitors, remain calm and in control. |
| 4. Do - if you are a tutor – know where all your learners are – keep a register of attendance for each day. | |

Remember – if you are with learners and visitors, it is important to:

- Remain calm.
- Reassure them.
- Remind them to follow your instructions.

9.1 Emergency Response Lockdown Fact Sheet for Staff & Learners

What is an emergency response lockdown?

An emergency response lockdown confines staff and learners to the classroom due to a perceived or real threat.

Lockdowns (all lock downs are to be treated the same):

- Emergency Response Lockdown drills are led by the Safe and Sound Manager and Health and Safety officer.; drills are done to help learners and staff practice the procedures of a lockdown.
- Emergency Response Lockdown drills led by the Safe and Sound Manager and Health

and Safety officer. these unannounced drills help assess lockdown performance and make recommendations, so improvements and/or changes can be made.

- Emergency Response Lockdowns led by law enforcement; these are **not** drills and are typically put in place because of a situation happening on or off site. They are precautionary measures to keep learners, staff and visitors safe until law enforcement has controlled the situation. Examples of off-site situations include potentially dangerous persons, animals or natural threats such as gas leaks. Internal threats can be led by law enforcement.

What happens during a lockdown?

- The Designated Emergency Response Lockdown Lead/Manager or Emergency Response Lockdown Deputy Manager makes an announcement that a lockdown is in effect.
- All building doors are locked, and no one can come in or out of the building or classrooms.
- Learners are kept calm by the classroom tutor/ trainer.
- Once the lockdown is lifted, normal instruction and activities resume.

What should parents/ guardians do during Emergency Response lockdowns?

- Refrain from attending the site. Emergency response lockdowns prohibit the entrance, dismissal or release of any persons until the lockdown is lifted.
- Be on alert for announcements from Babington's website, Facebook and Twitter.
- Trust Babington and the steps in place to keep learners, employees and visitors safe.

Basic Safety Advice

The risk of being involved in an incident is low. Most people will never have the misfortune to be in the same locality at the same time as an incident

There are a few sensible precautions that you can take which may help you to come out of an incident without harm.

Bombs

Although warnings are sometimes given by members of terrorist groups before a bomb attack, on the whole the terrorist uses the slaughter of innocent civilians as a means of attracting attention.

If a bomb goes off in a building

- Do not attempt to use the lifts/elevators.
- Stay close to walls.
- Keep clear of windows, especially if they are cracked or shattered, unless you need to signal for help.
- Do not use matches or lighters in case there is a gas leak and you set off a secondary explosion.
- Do not touch or pick up any loose electrical wires and cables.
- If you are trapped, try knocking on a pipe or radiator to attract attention of rescuers.
- If the bomb goes off outside your building, do not go outside and keep away from windows in case there is a second explosion that shatters the glass.
-

Suicide Bombers

In a public space there are hundreds of people wearing backpacks or carrying briefcases and suitcases. Look out for anyone who seems particularly nervous or who is looking around furtively. No matter how fanatical terrorists might be, they are likely to show normal human signs of tension and nervousness.

They may be unusually nervous about people around them or anyone bumping into them. They may look warily at any officials and steer well clear of police or police dogs. If it is hot and most people are wearing minimum clothing, they may appear overdressed and be sweating as well as nervous. Remember if you see or find a suspicious package / item refer to the HOT protocol. Is the object Hidden, Obvious and Typical of its surroundings.

Situational Awareness

The urban environment is full of potential hazards. These include everyday hazards such as walking under ladders and crossing the road, to crime-related hazards such as robbery and assault. The best way to ward off potential hazards is preparation and awareness, as well as common sense.

When you leave your home, office or other location, be aware of how long you plan to be out and take with you whatever you might need, including money, a mobile telephone and clothing suitable for the current weather conditions or any predicted changes in the weather. An emergency could arise simply because you were out longer than expected and nobody could get in touch with you. When you leave, let somebody know your likely route of travel and when you plan to return.

Depending on the threat level in the area in which you live, it is always a good idea to walk with your hands free in case you need to defend yourself. Always remain alert and do not wear earphones, as it will prevent you from hearing suspicious noises, shouted warnings and the sound of approaching cars, motorcycles or bicycles.

Responding to an Incident

Giving advice in the event of a terrorist attack is a very challenging issue, as so much depends upon the emerging situation.

The UK Government has issued the following advice on how to behave in a gun or bomb attack:

Run

- Escape if you can.
- Consider the safest options.
- Is there a safe route? Run, if not hide.
- Can you get there without exposing yourself to greater danger?
- Insist others leave with you.
- Leave belongings behind.

Hide

- If you can't run, hide.
- Find cover from gunfire.
- If you can see the attacker, they may be able to see you.
- Cover from view does not mean you are safe, bullets go through glass, brick, wood and metal.
- Find cover from gunfire e.g., substantial brickwork/heavy reinforced walls.

- Be aware of your exits.
- Try not to get trapped.
- Be quiet, silence your phone.
- Lock/barricade yourself in.
- Move away from the door.

Tell

- Call 999: What do the police need to know?
- Location: Where are the suspects?
- Direction: Where did you last see the suspects?
- Descriptions: Describe the attacker, numbers, features, clothing, weapons etc.
- Further information: Casualties, type of injury, building information, entrances, exits, hostages etc.
- Stop other people entering the building if it is safe to do so.

Basic Safety Rules

- Do **NOT** attempt to tackle the terrorists.
- Do **NOT** pick up any weapons or arm yourself.
- When the rescue services arrive, be compliant to their commands.
- You may be treated as a suspect in the initial rescue.

Safety on Public Transport

Bus

As with all urban safety, be aware, plan and prepare when taking a public bus. Make sure you know your route and have enough money to get there and back. Do not hang around deserted bus stops or where there are suspicious people about or people who have obviously had too much to drink. If the bus is empty or if there is someone suspicious or threatening aboard, make sure you sit close to the driver. Have a mobile phone and a safety alarm to hand when approaching a bus stop on foot or when leaving the bus.

If you do not have the bus fare, do not attempt to find your way on foot unless you know the area well. Do not accept a lift or help from a stranger. If necessary, call a friend or family member and explain that you are stranded.

Taxi

Always use a reputable taxi firm and check that the taxi that arrives is the one you ordered. The driver should carry the correct identification and be able to identify you. Do not fall asleep in the taxi, and if you are unsure of the driver's intent ask to be dropped off in a well-lit area.

Train/Tube

or tube is relatively safe. Modern trains often have CCTV in the carriages so the guard can see what is going on at all times. Yet some precautions are still necessary. When waiting for a train at the platform, make sure you stand in a well-lit area. Keep on the lookout for anyone suspicious and remain in a group of people if possible. When you get on the train, do not sit in a carriage on your own if possible, and avoid groups of rowdy or intimidating individuals.

If necessary, find out where the guard is located and sit near there. It is preferable to choose a seat where you are close to a door or have a compartment barrier behind you, so that you can see everyone before you and no one can approach from behind. If disruptive or suspicious people get on the train, move to another carriage or contact the guard. Try not to fall asleep on a train, as this will make you vulnerable to pick-pockets or attack and you may also miss your stop.

To report a crime or incident to British Transport Police you can call 0800 40 50 40 or text 61016



Emergency Response Lockdown

BABINGTON SAFETY PROCEDURE



In the event of a Lockdown Emergency call: 999

Report Incidents to the Safe and Sound Manager: 07341 864122

Partial Emergency Response Lockdown Immediate Action

In a partial emergency response lockdown staff, learners and visitors should remain in the building and all doors leading outside of the Babington boundary should be locked.

No one should be allowed to enter or leave the building; however, teaching and work can continue as usual. This may be as a result of a reported incident/civil disturbance in the local community with the potential to pose a risk to the occupants on site. It may also be as a result of a warning being received regarding the risk of air pollution, etc.

- All staff, learners and visitors remain in building and external doors and windows are locked.
- Free movement may be permitted within the building dependent upon circumstances.
- In the event of an air pollution or chemical, biological or radiological contaminants issue, air vents, fans, heating and air conditioning systems should be closed or turned off.
- Use anything to hand to seal up all the cracks around doors and any vents into the room – the aim is to minimise possible ingress of pollutants.
- Staff should await further instructions.

Full Emergency Response Lockdown Immediate Action

This signifies an immediate threat to the site and the occupants and may be an escalation of a partial emergency response lockdown highlighted above. The aim of a full emergency response lockdown is for the location and its rooms to appear empty.

- All training staff, learners and visitors should stay in their training room or move to the nearest one.
- Office staff and visitors should remain in their office.
- External doors locked. Training room and office doors locked (where a member of staff with key is present).
- Windows locked, blinds drawn, internal door windows covered (so an intruder cannot see in).
- Staff, learners and visitors sit quietly out of sight and where possible in a location that would protect them from gunfire (bullets go through glass, brick, wood and metal)(Consider locations behind substantial brickwork or heavy reinforced walls).
- Lights, smartboards and computer monitors, etc. turned off.
- Mobile phones turned off (or at the least turned onto silent so they cannot give away your position).
- A register to be taken of all staff, learners and visitors in each training room/office – ensure that local Visitor Procedures are adhered to;
- Communicate register of staff, learners and visitors to a pre-agreed central office, and Staff should await further instructions.

It is important to keep lines of communication open with Emergency Services as they are best placed to offer advice as a situation unfolds.

Building Address: Add Address

Health and Safety Contact: Safe and Sound Manager: 07341 864122

Email: healthandsafety@babington.co.uk

Doc – 1,722 Emergency Response Lockdown Poster

Scope

Online Safety Bill

What is the Online Safety Bill and what does it mean for users?

The Online Safety Bill is a proposed Act of the Parliament of the United Kingdom intended to improve internet safety. It marks a milestone in the fight for a new digital age which is safer for users and holds tech giants to account. It will make the internet a safer place for everyone in the UK and protect children from harmful content such as pornography and limit people's exposure to illegal content, while protecting freedom of speech.

What are the key points the Bill covers?

The Bill introduces new rules for firms which host user-generated content, i.e., those which allow users to post their own content online or interact with each other, and for search engines, which will have tailored duties focussed on minimising the presentation of harmful search results to users.

Those platforms which fail to protect people will need to answer to the regulator and could face fines of up to ten per cent of their revenues or, in the most serious cases, being blocked.

All platforms in scope will need to tackle and remove illegal material online, particularly material relating to terrorism and child sexual exploitation and abuse.

Platforms likely to be accessed by children will also have a duty to protect young people using their services from legal but harmful material such as self-harm or eating disorder content. Additionally, providers who publish or place pornographic content on their services will be required to prevent children from accessing that content.

The largest, highest-risk platforms will have to address named categories of legal but harmful material accessed by adults, likely to include issues such as abuse, harassment, or exposure to content encouraging self-harm or eating disorders. They will need to make clear in their terms and conditions what is and is not acceptable on their site and enforce this.

These services will also have a duty to bring in user empowerment tools, giving adult users more control over whom they interact with and the legal content they see, as well as the option to verify their identity.

Freedom of expression will be protected because these laws are not about imposing excessive regulation or state removal of content but ensuring that companies have the systems and processes in place to ensure users' safety. Proportionate measures will avoid unnecessary burdens on small and low-risk businesses.

Finally, the largest platforms will need to put in place proportionate systems and processes to prevent fraudulent adverts being published or hosted on their service. This will tackle the harmful scam advertisements which can have a devastating effect on their victims.

Protecting children:

For children, these new laws will mean that all in-scope companies must assess risks and take action to tackle illegal activity that threatens the safety of children.

In addition, platforms likely to be accessed by children will need to:

- prevent access to material that is harmful for children, such as pornography.
- ensure there are strong protections from activity, which is harmful to children, which we expect will include harms such as bullying.

If a child does encounter harmful content or activity, parents and children will be able to report it easily. Platforms will be required to take appropriate action in response.

Platforms will also have a duty to report any child sexual exploitation and abuse content that they encounter to the National Crime Agency, to assist with law enforcement efforts to stamp out this appalling crime.

Support for adults:

All in-scope platforms will need to tackle the presence of illegal material on their sites. If found, it will be easy to report it to the company, who will have to act quickly and take it down.

Major service providers will also need to make clear in their terms of service what legal content is acceptable on their sites and provide user-friendly ways to complain when things go wrong. The categories of content that companies' terms of service will need to address will be set out in secondary legislation and approved by Parliament.

On the largest sites, adults will have more control over who they interact with online, and the types of harmful content that they can see. This could, for example, mean that on a platform which allows self-harm content, individuals who feel that this content would be damaging to their mental health could choose not to be presented with it.

We are not requiring companies to remove legal content. Adults will still be able to access and post legal content that some may find offensive or upsetting if companies allow that on their services.

Adults will be able to make informed decisions about the online services they use and be able to trust the platforms will keep the promises they make.

To read more about the Online Safety Bill, please click on the below link

<https://www.gov.uk/government/publications/online-safety-bill-supporting-documents/online-safety-bill-factsheet>

Please read the online safety policy (3206) which gives more detailed information of how we safeguard our staff and learners.

Safeguarding Acts, Guidance & Legislations Overview

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| <u>The Children Act 1989 – amended 2004 (England & Wales)</u> | The Act places a duty on local authorities and their partners (including the police, health service providers and the youth justice system) to co-operate in promoting the wellbeing of learners and to make arrangements to safeguard and promote the welfare of children. |
| <u>The Children (Northern Ireland) Order 1995</u> | The Children Order (Northern Ireland) 1995, provides the legislative framework that governs the response to, and services provided for, children in need of support, at risk of harm and for those who have suffered abuse and harm. |
| <u>The Children (Scotland) Act 1995</u> | The Children (Scotland) Act 1995 outlines the legislative framework for Scotland's child protection system. It covers parental responsibilities and rights, and the duties and powers local public authorities have for supporting and promoting the safety and welfare of children. |
| <u>Working Together to safeguard children 2023</u> <u>Working Together under the Children Act 2004 - Health in Wales</u> <u>National guidance for child protection Scotland 2023</u> | It sets out how all agencies and professionals should work together to safeguard and promote children's welfare and protect them from harm. It is addressed to all statutory partners on Local Safeguarding Children Boards and others whose work brings them into contact with children and families. It is relevant to those working in the statutory, voluntary and independent sectors. |
| <u>The Protection of Vulnerable Groups (Scotland) Act 2007</u> | In 2007 the Scottish Parliament enacted the Protection of Vulnerable Groups (Scotland) Act ("the 2007 Act"). Part 1 of the 2007 Act provides for the barring of those persons that Scottish Ministers consider to be unsuitable for regulated work with children or protected adults (or both). The 2007 Act provides Scottish Ministers with a power to impose certain prohibitions or requirements on employers seeking to employ persons to do regulated work. Failure to comply with those prohibitions or requirements would result in the employers committing criminal offences under the 2007 Act. |
| <u>Protection of Freedoms Act 2012</u> | The Act removes existing police powers to retain biometric data from suspects who are not or convicted of any offence. It also reduces the length of time for which data can be retained, with only the data of those convicted of the most serious offences being subject to 'indefinite' retention. |
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| <u>Care Act 2014</u> | The Care Act 2014 sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. lead a multi-agency local adult safeguarding system that seeks to prevent abuse and neglect and stop it quickly when it happens. |
| <u>Channel and Prevent Multi -Agency 2023</u> <u>Prevent Duty guidance 2023</u> | The Prevent duty is the duty in the Counterterrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. |
| <u>The Terrorism Act 2000 (NI)</u> | An Act to make provision about terrorism; and to make temporary provision for Northern Ireland about the prosecution and punishment of certain offences, the preservation of peace and the maintenance of order. |
| <u>Counter Terrorism and Security Act 2015</u> | The Counterterrorism and Security Act contains powers to help the UK respond to the threat of terrorism. |
| <u>Modern Slavery Act 2015</u> | The Modern Slavery Act gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims. |
| <u>What to do if you are worried a child is being abused (2015)</u> | This advice is non-statutory and has been produced to help practitioners identify child abuse and neglect and take appropriate action in response. This advice replaces the previous version published in 2006, and complements Working Together to Safeguard Children (2018) statutory guidance. |
| <u>Children Missing in Education (2024)</u> | Statutory guidance for local authorities and advice for other groups on helping children who are missing education get back into it. |
| <u>Multi-agency guidance on FGM (2020)</u> | This statutory guidance sets out the responsibilities of chief executives, directors, senior managers and front-line professionals within agencies involved in safeguarding and supporting women and girls affected by FGM |
| <u>How to respond to an incident of sexting</u> | Advice for designated safeguarding leads (DSLs), their deputies, headteachers and senior leadership teams in schools and educational establishments in England. How to respond to incidents and safeguarding young people who are sharing sexual imagery. |
| <u>Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers (2017)</u> | Definition of child sexual exploitation, potential vulnerabilities and indicators of abuse and appropriate action to take in response. |
| <u>Disqualification under the Childcare Act 2006 (2018)</u> | Statutory guidance from the DfE, sets out the responsibilities of local authorities, schools, training providers, third party |

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| | organisations, employing staff to work in relevant school and childcare setting and the arrangements required to be in place to safeguard and promote the welfare of all children. |
| <u>Information sharing: advice for practitioners providing Safeguarding services (2024)</u> | This HM Government advice is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to learners and promotes their well-being. |
| <u>General Data Protection Act (2018)</u> | The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government. |
| <u>Keeping Children Safe in Education 2025</u> | This is statutory guidance from the DFE issued under section 175 of the education act. Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. |
| <u>Education and Training (Welfare of Children) Act 2021 (which amends the Education Act 2002)</u> | Imposes safeguarding duties on 16 to 19 further education establishments ensuring that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with |
| <u>Online Safety Bill 2023</u> | A Bill to make provision for and in connection with the regulation by OFCOM of certain internet services; for and in connection with communications offences; and for connected purposes. |


The Safe & Sound Manager is the owner of this document and has approved its publication. The document owner is responsible for ensuring that this document is reviewed annually or at an earlier date if changes are required legislative changes/ reforms in government advice. This document is issued on a version-controlled basis and is available to all colleagues on the corporate intranet

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| V 1.0 | Handbook created – all policies contained within the document reviewed and updated | Safe and Sound Manager | 01/09/2020 |
| V2.0 | Handbook updated to include Upskirting, Serious Crime, Contextual Safeguarding and links to legislations, acts and guidance's | Safe and Sound Manager | 15/06/2021 |
| V3.0 | Handbook updated to reflect the changes to KCSiE September 2021 | Safe and Sound Manager | 01/09/2021 |
| V4.0 | Handbook updated to include extracts from the Low-level concerns policy and e-Safety Policy added to handbook | Safe and Sound Manager | 13/12/2021 |
| V5.0 | Handbook checked and Online Safety Bill added | Safe and Sound Manager | 20/05/2022 |
| V6.0 | Handbook updated to reflect Key changes from KCSiE 2022. | Safe and Sound Manager | 15/09/2022 |
| V7.0 | Contents table edited to reflect additional entries, Domestic Abuse updated, Hackett's continuum added on sexual behaviours, External speaker policy updated with new risk assessment template. | Safe and Sound Manager | 04/10/2022 |
| V8.0 | Updated parts on Prevent and referral process. | Safe and Sound Manager | 01/02/2023 |
| V9.0 | Handbook updated to reflect key changes in KCSiE 2023, Old links removed. | Safe and Sound Manager | 21/09/2023 |
| V10.0 | Handbook links and text updated to reflect current legislative changes in KCSiE 2024 and safeguarding definitions of working together to safeguard children. | Safe and Sound Manager | 11/09/2024 |
| V11.0 | Handbook updated to reflect KCSiE 2025 | Safe and Sound Manager | 30/09/2025 |

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