

CILEX | Law School

Safeguarding and Prevent Handbook

Contents

Part One: Policy

1. Introduction and context
2. Defining extremism and British values
3. Young people, Vulnerable Adults, Vulnerable Students and other learners
4. Meeting our safeguarding and Prevent commitment
5. Roles and Responsibilities
6. Review and approval
7. Associated policies

Part Two: Procedures

1. Handling a disclosure of harm or abuse
2. Reporting concerns
3. Allegations about a member of staff or contractor
4. Allegations relating to another learner
5. Concerns about any CILEX Law School's safeguarding or Prevent practices
6. Safer recruitment procedures
7. Monitoring IT usage

Part three: Guidance for safer working practices for staff working with student

1. Purpose
2. Guidance notes
3. Appendices:
 - Appendix 1 – Staff with safeguarding responsibilities
 - Appendix 2 –
 - Appendix 3 – Flowchart of processes for reports and referrals: escalation process
 - Appendix 4 – Important numbers
 - Appendix 5 – Data held in the CILEX Law School Safeguarding Register

Part One: Safeguarding and Prevent Policy

1. Introduction and context

CILEX Law School is committed to ensuring the safety and welfare of all students and apprentices. This commitment reflects our shared ethos of working in the best interests of our learners and helping them to thrive.

Meeting our safeguarding and Prevent obligations involves putting into place a number of measures to create a safe environment for students, apprentices and staff. Whilst safeguarding and Prevent issues are not a frequent occurrence, all staff are advised to maintain an “it could happen here” attitude and must therefore be aware of this policy and associated procedures.

In essence, **safeguarding** aims to promote the welfare of young people and vulnerable adults, and protect them from harm or abuse. It involves taking action to enable all learners to have the best outcomes. Staff should familiarise themselves with the different types of abuse outlined in **Appendix 2**.

Prevent is a strand of the Government’s counter terrorism strategy, which raised an awareness of the specific need to safeguard children, young people and families from violent and non-violent extremism.

The three objectives of the Prevent strategy are to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote those views.
- Provide practical help and support to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which need to be addressed, including the education sectors, criminal justice, faith groups, the internet and health service.

Threats are not limited to the threat from religious extremists and we therefore need to be mindful of all potential threats to which our students are exposed.

Education institutions are under a duty to have due regard to the need to prevent people from being drawn into terrorism and have an integral part to play in fostering a set of shared ‘British values’ and promoting community cohesion. This handbook seeks to ensure that CILEX Law School meets this requirement.

This handbook has been developed in accordance with guidance issued by Ofsted and other relevant bodies.

2. Defining extremism and British values

This handbook will use the government’s own definition of extremism as contained within the Prevent strategy:

“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. We also include in our definition of extremism calls for the death of members of our armed forces.”

For the purposes of this policy British values will be defined as:

“Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different backgrounds, characteristics, beliefs and faiths”. Education providers are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010.

The Prevent duty guidance requires that leaders and teachers exemplify British values in their management, teaching and through general behaviours in institutions, including through opportunities in the curriculum.

3. Young people, Vulnerable adults and Students

3.1 Under 18s

Students and apprentices under 18 are referred to as young people in this handbook but are classed as children under relevant statutory guidance (the Children Act 2004 defines a child as anyone who has not yet reached their 18th birthday). In this context, safeguarding is defined as: protecting children from maltreatment; 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; and taking action to enable all children to have the best outcomes¹.

Child protection is part of the overall safeguarding duty. It relates to the procedures for children who have been, or are at risk of, significant harm. There isn’t a statutory definition of significant harm, but it’s important to be aware that this could include physical, sexual or emotional abuse and neglect. Sometimes a single traumatic event may constitute significant harm. In other circumstances it can be down to the cumulative effect of events.

3.2 Vulnerable adults

Safeguarding duties also apply to vulnerable adults as defined in the Care Act 2014.

The Act states that the safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs);
- is experiencing, or at risk of, abuse or neglect;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

A previously looked after student or apprentice potentially remains vulnerable. Apprentices are identified as Care Leavers on their Enrolment Forms for reporting purposes and this is not shared with delivery staff. If a safeguarding issue should arise during the course of their apprenticeship, their Care Leaver status will be considered by the Designated Safeguarding Officer (DSO) for any next intervention steps.

3.3 Vulnerable Students

Prevent duties relate to vulnerable students but this should not be confused with the definition of vulnerable adults in the context of safeguarding.

¹ See Keeping children safe in education Part 1: Information for all school and college staff

There is no single way to identify who is likely to be vulnerable or susceptible to radicalisation. Factors include, but are not limited to:

- Peer pressure
- Influence from others or the internet
- Family tensions
- Race/hate crime
- Lack of self-esteem or identity
- Craving a sense of belonging
- Feeling community is under threat
- Personal or political grievances

3.4 Other students and apprentices

We have a duty of care to all of our students and apprentices, regardless of their age or legal status as a vulnerable adult. It is important to recognise that any student or apprentice can be subject to abuse (such as domestic abuse, financial abuse, physical and emotional abuse etc). This means that our students and apprentices do not have to meet the statutory definition of a vulnerable adult for the procedures under this policy to be implemented.

4. Meeting our safeguarding and Prevent commitment

CILEX Law School will meet its safeguarding and Prevent commitments in the following ways:

4.1 Providing a safe learning environment

CILEX Law School will achieve this by:

- Raising awareness amongst staff and learners of issues relating to the welfare of young or vulnerable people.
- Raising awareness about safeguarding issues with learners and encouraging them to take responsibility for their own safety and welfare.
- Promoting a learning environment in which learners feel safe to express themselves and encouraging appropriate behaviours through our code of conduct and relevant policies (Anti-bullying, Prevent, Malpractice, Equality, Diversity, Inclusion and Accessibility, E-safety).
- Promoting and reinforcing a set of shared values, founded on tolerance and mutual respect for others.
- Providing e-learning platforms that are only accessible by approved users and contain appropriate online materials.
- For apprentices, ensuring that working environments have a health & safety and safeguarding check (HASS) in place and that the employer has the appropriate policies and procedures in place should a health & safety, Prevent or safeguarding issue arise.
- Encouraging learners to talk freely about anything that concerns them and ensuring they feel able to approach members of staff with these concerns.

- Providing a designated safeguarding hotline and email address so that learners can report issues confidentially, and ensuring learners have access to details of external organisations that can also provide support.
- Identifying and assessing potential problems and providing early interventions.
- Identifying young or vulnerable people who are suffering, or likely to suffer significant harm, and taking appropriate action to ensure that they are kept safe, including referral to an appropriate agency.
- Working with employers to raise awareness of safeguarding considerations and their obligations in this regard.
- Promoting a sense of community cohesion both within CILEX Law School and within its wider external community.
- Supporting students who may be at risk from radicalisation and being able to signpost them to further external sources of support where appropriate.
- Ensuring that prior to any literature being distributed by CILEX Law School from external agencies or by students, when this literature is not related to their programme of study, the permission of the of Apprenticeships, Quality and Compliance Head of Apprenticeships, Quality and Compliance or in her absence the Academic Director should be sought.
- Having an E-safety policy and procedure to promote online safety and educate students and apprentices about safe and responsible internet use.
- Requiring all staff to adhere to the strict staff IT policy
- Recruiting staff safely, ensuring all necessary checks are made.
- Maintaining and reviewing a central record of DBS checks.
- Ensuring staff are aware of their responsibilities in relation to Safeguarding and Prevent and are able to recognise and respond to vulnerable or susceptible students and apprentices.
- Undertaking risk assessments of external venues used for teaching and learning purposes.

4.2 Ensuring safeguarding and Prevent concerns are handled effectively

CILEX Law School will achieve this by:

- Ensuring staff receive annual safeguarding and Prevent training appropriate to their role so that they are aware of protection issues and responsibilities. All apprenticeship staff must confirm that they have received and read a copy of the Safeguarding Policy and Keeping Children Safe in Education Part 1 as part of their induction.
- Ensuring apprenticeship and all other relevant staff are alert to the signs of a potential safeguarding issue and Prevent concerns. Training enables staff to identify and understand the factors that make people susceptible to being drawn into extremism and the knowledge and understanding of their responsibility for referring any concerns to the Designated Safeguarding Officer through the CILEX Law School processes and procedures. A training log is held centrally.
- Ensuring all staff understand and promote the Prevent policy and engage in preventing radicalisation and extremism in accordance with the Government's Prevent strategy.
- Providing guidance to all relevant staff on how to handle safeguarding and Prevent disclosures sensitively, professionally and appropriately.

- Ensuring appropriate safeguarding and Prevent action plans are developed to assess, handle and monitor any safeguarding or welfare concerns effectively.
- Ensuring any records of safeguarding, Prevent or welfare concerns are kept in accordance with data protection requirements.
- Establishing appropriate procedures for reporting and dealing with allegations of abuse against members of staff.
- Treating information they receive when concerns are raised by students in a discreet and confidential manner.
- Developing effective links with relevant agencies and co-operating as required with their enquiries regarding child protection matters.
- Ensuring that we have robust processes for evaluating the effectiveness of our safeguarding practices and procedures.
- Where a safeguarding concern related to sexual violence has been referred to the Local Authority or an allegation of sexual abuse made against a member of CILEX Law School staff has been referred to the DSO or Academic Director in line with clause 8.1, CILEX Law School will, as soon as practicably possible, inform the ESFA via their online enquiry form **Education and Skills Funding Agency (ESFA) enquiry form - Customer type - DFE Online Forms**. Such notification will include the name of the institution, a high level summary of the nature of the incident and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority.

4.3 Ensuring that safeguarding and Prevent permeates our activities

CILEX Law School managers will create and maintain an **ethos** that upholds core values of shared responsibility and wellbeing for all students and staff whilst promoting respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation.
- Building staff understanding of potential issues and confidence to deal with them through mandatory staff training.
- Actively working with other agencies including the local authority, police and regional Prevent coordinator.

It is important that everyone is aware of CILEX Law School's legal responsibilities and works together to maintain high standards with regard to safeguarding and Prevent. Everyone must know the levels of responsibility and lines of communication that exist to ensure that all safeguarding and Prevent matters are dealt with efficiently and effectively.

CILEX Law School will provide a **curriculum** that promotes British values, knowledge, skills and understanding, to build the resilience of students. This will be achieved through:

- Covering British values, as well as the values of respect and tolerance, during induction.
- Embedding British values, equality, diversity and inclusion, wellbeing and community cohesion as appropriate through the curriculum.
- Promoting wider skills development.
- Teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis and pro-social values.

- Encouraging active citizenship and learner voice.

CILEX Law School will ensure that staff take **preventative and responsive steps**, working with partner professionals and other parties where appropriate. This will be achieved through:

- Strong, effective and responsive learner support.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.
- Recognising factors that may increase risk to a student, i.e. vulnerability, disadvantage or hardship, and implementing early risk management strategies.
- Ensuring that students and staff know how to access support.
- Supporting 'at risk' students through safeguarding processes.
- Focusing on narrowing the attainment gap between different groups of students.

As primarily a distance learning provider, CILEX Law School does not have physical premises used by external speakers or for events. A policy is not therefore required to manage such events, but this need will be kept under review.

5. Roles and responsibilities

5.1 General

Safeguarding, Prevent and promoting the welfare of our learners is everyone's responsibility. All staff, board members, directors, independent contractors and learners have a role to play in providing a safe environment for our learners.

5.2 Apprenticeship Safeguarding Committee

The Apprenticeship Safeguarding Committee is responsible for:

- Appointing a senior board level lead for CILEX Law School's safeguarding matters.
- Ensuring that effective safeguarding and Prevent policies are in place, together with a staff behaviour policy.
- Ensuring a designated safeguarding officer is in place and that they are suitably trained.
- Ensuring that an effective safer recruitment policy is in place.
- Ensuring that the safeguarding and Prevent policies and procedures are implemented in a timely and effective way to benefit learners.

5.3 The Senior Management Team

The Senior Management Team is responsible for:

- Leading by example in taking every opportunity to promote learner safety and welfare considerations.
- Scrutinising safeguarding and Prevent practices and initiatives.
- Monitoring the implementation of the Safeguarding and Prevent policies and procedures ensuring staff implement the duty effectively.

5.4 The Academic Director

The Academic Director is responsible for:

- Championing safeguarding and Prevent considerations.
- Ensuring that this policy and associated procedures are implemented.
- Ensuring that our safeguarding provision is adequately resourced, including safer recruitment processes.
- Appointing a Safeguarding Lead at Board level.
- Ensuring that all staff have the opportunity to undertake appropriate safeguarding training.
- Ensuring that there are adequate procedures in place for handling allegations against staff.

5.5 The Internal Safeguarding Committee

The Safeguarding Committee will comprise of the Designated Safeguarding Officer (Student Wellbeing Manager Head of Apprenticeship, Quality and Compliance, Quality Manager, Head of Teaching Learning and Student Experience (Academic Director), Student Wellbeing Advocate, Corporate Compliance Manager and Corporate Compliance Officer. It will meet quarterly and will be responsible for:

- Auditing safeguarding records.
- Updating the Safeguarding, Prevent, E-safety and Equality, Diversity, Inclusion and Accessibility policies in line with legal requirements.
- Reviewing the timeliness and effectiveness of our safeguarding and Prevent practices and procedures and any concerns raised or changes to the Prevent duty, evaluating the strengths and weaknesses.
- Developing and reviewing the Safeguarding and Prevent Risk Assessment and Action Plan.

5.6 Head of Apprenticeships, Quality and Compliance

The Head of Apprenticeships, Quality and Compliance is responsible for:

- Acting as Safeguarding Lead at Board level
- Ensuring that safeguarding procedures are in place and coordinating safeguarding practices across CILEX Law School programmes.
- Ensuring that all new staff have appropriate safeguarding and Prevent training during induction and that this is updated on an annual basis.
- Raising staff awareness about safeguarding and Prevent on a regular basis.
- Acting as the Safeguarding Lead in the absence of the Designated Safeguarding Officer.
- Embedding safeguarding and Prevent across the curriculum and ensuring that the effectiveness of this is monitored during course reviews and staff observations.
- Keeping abreast of all regulations and requirements regarding safeguarding, to include annual training in safeguarding and inter-agency working.
- Be the Deputy DSO and in the absence of the DSO assume their duties.

5.8 The Designated Safeguarding Officer (DSO)

The Designated Safeguarding Officer is also the Prevent Lead and is responsible for:

- Providing advice and support to colleagues on issues relating to young or vulnerable people's protection.
- Providing guidance to learners about how to obtain suitable support relating to safeguarding issues.
- Maintaining a proper record of any referral, complaint or concern (even where that concern does not lead to a referral to an external agency).
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Monitoring the completion of safeguarding and Prevent training across CILEX Law School and notifying relevant managers where training has not been completed.
- Briefing the Head of Apprenticeships, Quality and Compliance on any relevant safeguarding incident or issues that arise.
- Briefing the Head of Apprenticeships, Quality and Compliance on any referral to an external agency.
- Briefing the Academic Director on the implementation of this policy and associated procedures.
- Keeping abreast of all regulations and requirements regarding safeguarding, to include annual training in safeguarding and inter-agency working.
- Promotion of British values and how these values are embedded as part of CILEX Law School's teaching and learning sessions. They will work on a regular basis with the Head of Apprenticeships, Quality and Compliance and Quality Manager to resolve any issues.

5.9 All staff and freelance tutors

All staff have a responsibility to:

- Create and support an ethos that upholds CILEX Law School's mission and values, including British values, with a view to creating an environment of respect, equality, diversity, inclusion and accessibility.
- Complete Safeguarding and Prevent training in order to have the skills to recognise those who may be susceptible to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns.
- Report any Safeguarding concerns or concerns around extremism or radicalisation via the safeguarding channels.
- Support the development of staff and student understanding of safeguarding issues and the issues around extremism and radicalisation as appropriate through activities such as training and awareness campaigns.

5.10 Human Resources

Human Resources are responsible for:

- Ensuring that all safer recruitment checks are carried out.

- Maintaining a single central register of DBS checks and ensuring these are updated as appropriate.
- Ensuring that there are procedures in place to handle allegations against members of staff.
- Monitor completion of mandatory training.

6. Approval and review

This policy has been approved by the CILEX Law School Senior Management Team and will be reviewed annually.

7. Associated documentation

- E-safety policy
- Equality and Diversity policy
- Health and Safety policy
- Teaching, Learning and Assessment policy
- Quality Assurance policy
- Staff Code of Conduct
- CILEX Law School Guidance on safer working practice for staff working with young people and vulnerable adults
- Whistleblowing policy

8. Relevant guidance

- Ofsted Safeguarding policy (2021)
- Keeping Children Safe in Education ~~(2023)~~(2024)
- Working Together to Safeguard Children ~~(2022)~~(2023)
- Inspecting safeguarding in early years, education and skills settings: Guidance for inspectors undertaking inspection under the education inspection framework (2022)
- Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Care and support statutory guidance (2023)

| | |
|----------------------------------|-------------------|
| Date of document approval | September 2024 |
| Version number | 10 |
| Designated owner | Academic Director |
| Date of next review | September 2025 |

Part Two: Procedures

1. Handling a disclosure of harm or abuse

If a young person tells a member of staff about possible harm or abuse the following guidance should be followed:

- Listen carefully to what is being said without displaying shock, disapproval or dismay.
- Do **not** interview the person concerned; listen, only asking questions when necessary to clarify in order to be sure that you understand what they are telling you.
- Allow the person to speak freely ensuring you do not put words into their mouth.
- Reassure them that by telling you, they have done the right thing, that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that that they are creating a problem by reporting abuse, or made to feel ashamed for making a report.
- Do **not** promise to keep what they tell you confidential as this may not ultimately be in their best interests.
- Explain to them that you may have to pass the information on to the Designated Safeguarding Officer, but that only those that need to know about it will be told.
- Take contemporaneous notes or make notes as soon as possible after the conversation. Do **not** destroy any original notes.
- Record in the note: the date, time, place, what the person said and did, and a full account of your conversation, any noticeable non-verbal behaviour and anything else that concerns you.
- The note should include the learner's wishes regarding action to be taken. However, the learner must be made aware that this will not affect a final decision as to action or referral.
- Do **not** investigate concerns or allegations,
- but report them immediately to the Designated Safeguarding Officer.
- It may be appropriate to remind the learner about the availability of external help lines.

2. Reporting concerns

Anyone can make a referral about a concern they have for a vulnerable student and this can come from within CILEX Law School or through someone external such as a parent, fellow student, police or social services.

If any member of staff has concerns about a learner, they will need to make a decision as to what action to take. This should be a balanced and proportionate response to the particular concern. If in doubt, seek the advice of the Designated Safeguarding Officer as soon as possible, without sharing the name of the learner during that initial discussion.

Where the circumstances involve actual or suspected abuse or harm, staff must inform the Designated Safeguarding Officer as soon as possible, and on the same day at the latest. The learner must be told that this information cannot be kept confidential and will be passed on to the Designated Safeguarding Officer in the first instance.

Concerns specifically related to students who may be susceptible to radicalisation should be reported to the Designated Safeguarding Officer (DSO). The DSO will then complete an assessment on that individual to assess where and how they may be at risk of being radicalised.

The assessment will follow three criteria:

- Engagement with a group, cause or ideology
- Intent to cause harm, and
- Capability to cause harm

If the assessment meets the threshold, action recommended in light of the concern will be agreed and this could include a referral to an external agency.

Making a referral to Channel or other agencies

The Designated Safeguarding Officer, or in their absence the Head of Apprenticeships, Quality and Compliance will make a decision as to whether concerns should be raised with an external agency. The Designated Safeguarding Officer who may decide to call a special safeguarding group meeting to discuss concerns, make a referral to Channel and monitor issues.

2.1 Where there is actual or suspected abuse or harm

Step 1

Information should be reported by the member of staff as soon as possible, and on the **same day at the latest**.

The report must include a clear, precise and factual account of any disclosures or observations made in accordance with **section 6** above. It must include the time and location of the incident and considerations must be given to the impact the incident may have on siblings.

Note that any report submitted by email should be in a separate password protected word document. The password for the document should be sent in a separate email.

Step 2

The Designated Safeguarding Officer may, following consideration of the facts, decide that a referral to an external agency is not required. If in doubt the Designated Safeguarding Officer will seek advice from the appropriate investigating agency and agree any further action which may be necessary. This may include a formal referral using the agency's pro forma.

Learners will be encouraged to give consent for a report to be made to an investigating agency. This will usually be the Children's Services department in the area where the learner lives, via the relevant Multi-Agency Support Hub (MASH). The learner should be made aware that it may be necessary to make the report even without their consent.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

If a referral to an external service or agency is not required, the Designated Safeguarding Officer will agree an appropriate action plan with the staff member who made the report. The action plan will assess the level of risk in the light of the particular circumstances and the frequency of any ongoing monitoring. The learner will be contacted by the member of staff who reported the concern, and made aware of any internal (e.g. Learner Support) or external services available to them (e.g. LawCare).

A summary of this process is included at **Appendix 3**.

2.2 Where a student or apprentice is in danger or at risk of significant harm

If, at any point, there is a risk of significant harm to a student or an apprentice a referral should be made to an appropriate agency (children's social care if under 18) and/or the police **immediately**. Any member of staff can make a referral, but must later notify the Designated Safeguarding Officer who will decide what further action, if any, needs to be taken.

2.3 Data protection and the sharing of information with other agencies

Sharing information is essential to maintaining effective safeguarding arrangements. Whilst the General Data Protection Regulation places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a young person or vulnerable adult being placed at risk of harm.

If a member of staff has any concerns about whether or not to share information, they should seek guidance from the Designated Safeguarding Officer as soon as possible on a no names basis.

Staff should ensure that any information shared is necessary for the purpose for which it is shared, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely. Keep it necessary and proportionate.

2.4 Record keeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any actions taken, decisions reached and the outcome.

Written records are confidential and must be kept in a locked cabinet if in hard copy or password protected in a restricted access folder if a soft copy. The subject of the record may access the record, but not any third parties other than designated members of staff.

The Designated Safeguarding Officer will keep an electronic register of safeguarding concerns for monitoring purposes. All electronic records saved in the main hard drive, including the register and any action plans, are password protected. All correspondence relating to a safeguarding matter, is now saved in CILEX Law School's SharePoint which only the DSO and Deputy DSO have access. (see Appendix 6 for data collated in the safeguarding register).

Records will be kept until the January which falls two years after the completion of, or earlier termination of, the programme or apprenticeship for which CILEX Law School was the training provider.

2.5 Disclosure to other members of staff

Details about a safeguarding concern should only be shared with designated members of staff (see **Appendix 1**).

Exceptionally, there may be circumstances when a safeguarding matter should be disclosed to a staff member other than a designated member of staff, however a clear justification will be required and this reason should be clearly recorded by the Designated Safeguarding Officer.

2.6 Support for staff

The Designated Safeguarding Officer can provide advice and guidance on safeguarding procedures.

Human Resources can provide access to additional support in dealing with any disclosure that a staff member finds particularly distressing.

3. Allegations about a member of staff or contractor

CILEX Law School has a staff Code of Conduct, complemented by the Guidance on safer working practice for staff working with young people and vulnerable adults (**Appendix 5**) which sets out clear expectations in terms of staff behaviours. The CILEX Code of Conduct also sets out the professional and responsible standards expected from CILEX employees. Nonetheless, CILEX Law School accepts that allegations against staff may occur.

3.1 Handling allegations of harm or abuse

All such allegations will be taken seriously and handled in accordance with statutory guidance.

Where an allegation of harm or abuse relating to a young person or vulnerable adult is made against a member of staff, the matter will be reported to the appropriate authorities, normally the Local Authority Designated Officer (LADO). The staff Disciplinary procedure will be invoked, but any investigation taken under an external agency's procedures will take precedence over internal CILEX Law School procedures.

Any member of staff who receives an allegation about another member of staff or contractor should report the concern as soon as possible but within 24 hours at the latest to the Academic Director, or in her absence, to the Head of Apprenticeships, Quality and Compliance Should the allegation relate to the

Academic Director, the matter should be referred to the chair of the Apprenticeship Safeguarding Committee. If the allegation is one of sexual violence or abuse please refer to paragraph 4.2.

Where an allegation is made by a learner aged 18+, it will be investigated in line with the CILEX Law School Staff Disciplinary procedure, unless the learner is deemed to be a vulnerable adult.

3.2 Notification to DBS

Regulated activity, as defined by the Disclosed and Barring Service (DBS), includes activity with children and adults such as teaching and training, supervision and advice or guidance.

All staff who have been identified as having regulated activity with CILEX Law School, will have an enhanced level DBS check and a check of DBS Barred Lists.

Where a member of staff involved in a regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the matter will be referred to the Disclosure Barring Service where CILEX Law School is under a statutory obligation to do so.

3.3 Consequential improvements to safeguarding procedures and/or policies

Where a safeguarding allegation has been made against a member of staff, the Academic Director and Designated Safeguarding Officer should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the safeguarding procedures and/or policies. Consideration should also be given to the training needs of staff.

3.4 False allegations

If it is subsequently found that a student or apprentice has made a false allegation, the matter will be investigated in accordance with the CILEX Law School learner disciplinary procedures.

4. Allegations relating to another learner

It is important that staff recognise that young people are capable of abusing their peers (“peer on peer abuse”). Such abuse can manifest itself in many ways. **Appendix 2** includes some examples of abuse. Staff must recognise that abuse is abuse and should never be tolerated or passed off as “banter” or “just having a laugh”, as this can lead to a culture of unacceptable behaviours, an unsafe environment for young people and in worst case scenarios a culture that normalises abuse leading to young people accepting it as normal and not coming forward to report it.

If any learner makes an allegation of abuse against another learner this must be reported to the Designated Safeguarding Officer. The Designated Safeguarding Officer will decide whether the matter is of a serious nature or should be dealt with under CILEX Law School’s policies for example, Disciplinary or Anti-Bullying.

If the allegation of abuse is of a sexual or serious nature the learner should be supported to report the matter directly to the police. The Designated Safeguarding Officer will in all cases

involving a young person report the matter directly to the Multi-Agency Safeguarding Hub (MASH). Should the learner be unwilling to report the matter to the police the Designated Safeguarding Officer will seek additional advice and guidance, will consult informally with the local police officer, and will seek to work with the learner to ensure there are appropriate measures and strategies in place to support his or her safety.

5. Concerns about any CILEX Law School's safeguarding or Prevent practices

CILEX Law School promotes an ethos of openness and engagement with staff. Should a member of staff have any concerns about our safeguarding practices, they are encouraged to contact the Designated Safeguarding Officer in the first instance. This can be orally or in writing.

If the member of staff does not wish to contact the Designated Safeguarding Officer or does not feel that their concern has been satisfactorily addressed by the Designated Safeguarding Officer, they should contact the Head of Apprenticeships, Quality and Compliance or Academic Director who will investigate and notify the member of staff of the outcome of that investigation.

CILEX Law School has a whistleblowing policy and associated procedure for staff to follow if they have any concerns about potential malpractice or misconduct on the part of any of their colleagues.

6. Safer recruitment procedures

CILEX Law School has recruitment and selection procedures that ensure that all staff are safe to work with learners as follows:

- A clear job description will be prepared. This should refer to our safeguarding commitment in order to deter applicants who are unsuitable for work within CILEX Law School.
- Essential selection criteria for the post will be identified.
- Documentary evidence of any academic or vocational qualifications will be required.
- Professional and character references will be required.
- The interview process will explore the candidate's attitude to young people.
- Vacancies will be advertised nationally in order to ensure a diversity of applicants.
- CILEX Law School will carry out appropriate DBS checks and will not knowingly employ anyone who is barred in a DBS regulated activity.

7. Monitoring IT usage

CILEX Law School utilises industry standard 'Checkpoint' filters to blacklist access to specific websites. Students and apprentices have access to the CILEX Law School Hub (VLE) but currently apprentices do not have access to forum functionality to avoid any concerns in relation to bullying and harassment. Non apprenticeship students have access to the forum functionality and a community page. Students are required to follow the Forum and Community rules and activity is monitored on these pages. All learners will access the internet using their own, or employers' systems, and accordingly the 'filtering and monitoring' as set out at Part Two of paragraph 141 of the KCSIE 2023 is not applicable.

7a. Filtering and Monitoring

All delivery team staff are responsible for monitoring those accessing CLS Hub materials, joining webinars and online meetings.

Digital awareness and online safety make up part of the apprenticeship induction and learners are encouraged to understand their own employer's acceptable usage policy. Cyber security and online safety form part of the progress review discussions with apprentices regarding local risks. The delivery team also complete mandatory annual Information Security training which covers the requirements of cyber security training and also receive extremism and radicalisation training delivered by the Designated Safeguarding Officer and Welfare Lead.

Part three: Guidance for safer working practice for staff working with students

1. Purpose

These guidelines apply to all staff working in all settings irrespective/regardless of their position, role or responsibilities. All staff should have a clear understanding about the nature and content of this document and seek to discuss any uncertainties or confusion with their line manager.

Throughout these guidelines reference is made to young people. This term refers to those under the age of 18. CILEX Law School recognises that some adults are also vulnerable to abuse; accordingly, these guidelines may be applied (with appropriate adaptations) to the protection of vulnerable adults.

2. Guidance

2.1 Duty of Care

Everyone who works with, and on behalf of, students and apprentices is accountable for the way in which they exercise authority, manage risk, use resources and safeguard young people. This means that they are required to understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.

Staff should:

- Always act, and be seen to act, in the young person's best interests.
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Take responsibility for their own actions and behaviour.

2.2 Confidentiality

Staff may have access to confidential information about students and apprentices in order to undertake their responsibilities. In some circumstances they may have access to or be given highly sensitive or private information. These details must be kept confidential at all times and only shared when it is in the interests of the young person to do so. Such information must not be used to intimidate, humiliate, or embarrass the person concerned.

Staff should:

- Be clear about when information can be shared and in what circumstances it is appropriate to do so.
- Treat information they receive about young people in a discreet and confidential manner.
- Seek advice from their line manager if they are in any doubt about sharing information they hold or which has been requested of them.
- Know to whom any concerns or allegations should be reported.

2.3 Making a professional judgement

This guidance cannot provide a complete checklist of what is, or is not appropriate behaviour for staff in all circumstances. There may be occasions and circumstances in which staff have to make decisions or take action in the best interests of the young person which could contravene this guidance or where no guidance exists. Staff are expected to make judgements about their behaviour in order to secure the best interests and welfare of the young person.

Where no specific guidance exists staff should:

- Discuss the circumstances that informed their action, or their proposed action, with their line manager.
- Report any actions which could be misinterpreted to their line manager.
- Always discuss any misunderstanding, accidents or threats with their line manager.
- Always record discussions and reasons why actions were taken.
- Record any areas of disagreement about the course of action taken and if necessary referred to a higher authority.

2.4 Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all staff working with young people are in positions of trust in relation to the young person in their care. Broadly speaking a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity.

Staff should not:

- Use their position to gain access to information for their own or others' advantage.
- Use their position to intimidate, bully, humiliate, threaten, coerce or undermine young people and their dignity or safety.
- Use their status and standing to form or promote relationships which are of a sexual nature, or which may become so. Where a person aged 18 or over is in a specified position of trust with a young person under 18, it is an offence for that person to engage in sexual activity with or in the presence of that young person or to cause or incite that young person to engage in or watch sexual activity (Sexual Offences Act 2003).

2.5 Propriety and Behaviour

Staff are expected to adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

Staff should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with young people or act as a role model.
- Make, or encourage, others to make unprofessional personal comments which scapegoat, demean or humiliate, or which might be interpreted as such.

Staff should:

- Be aware that behaviour in their personal lives may impact upon their work with young people.
- Follow the staff code of conduct.
- Understand that the behaviour and actions of their partner (or other family members) may raise questions about their suitability to work with young people.

2.6 Dress and Appearance

A person's dress and appearance are matters of personal choice and self-expression however those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations. NB Students and apprentices will be required to adhere to their employer's dress code.

Staff should wear clothing which:

- Is appropriate to their role.
- Is not likely to be viewed as offensive, revealing, or sexually provocative.
- Does not distract, cause embarrassment or give rise to misunderstanding.
- Is absent of any political or otherwise contentious slogans.
- Is not considered to be discriminatory and is culturally sensitive.

2.7 Personal Living Space

No young person should be in, or invited into, the home of a member of staff.

Staff should:

- Be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations.
- Challenge any request for their accommodation to be used as an additional resource for CILEX Law School.
- Be mindful of the need to maintain professional boundaries.
- Refrain from asking young people to undertake any personal jobs or errands.

2.8 Gifts, Rewards and Favouritism

The giving of gifts or rewards to young people should be part of an agreed policy for supporting positive behaviour or recognising particular achievements.

Staff should:

- Be aware of CILEX Law School's Anti-Bribery Policy.
- Ensure that gifts received or given in situations which may be misconstrued are declared.
- Only give gifts to an individual young person as part of an agreed reward system.
- Ensure that all selection processes which concern young people are fair and that wherever practicable these are undertaken and agreed by more than one member of staff.

2.9 Infatuations

Occasionally, a young person may develop an infatuation with a member of staff who works with them. These members of staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned.

Staff should:

- Report and record any incidents or indications (verbal, written or physical) that suggest a young person may have developed an infatuation with a member of staff.
- Discuss this at the earliest opportunity with their line manager so appropriate action can be taken to avoid any hurt, distress or embarrassment.
- Always acknowledge and maintain professional boundaries.

2.10 Communication with young people (including the use of technology)

Communication between young people and staff, by whatever method, should take place within clear and explicit professional boundaries.

Staff should:

- Not give their personal contact details to students or apprentices, including their mobile telephone number.
- Only use equipment e.g. mobile phones, provided by CILEX Law School to communicate with young people.
- Only make contact with students for professional reasons and in accordance with CILEX Law School policy.
- Recognise that text messaging is rarely an appropriate response to a young person in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible.
- Not use internet or web-based communication channels to send personal messages to a student.

2.11 Social Contact

Staff who work with young people should not seek to have social contact with them or their families, unless the reason for this contact has been firmly established and agreed with their line manager. Where social contact is an integral part of work duties, care should be taken to maintain appropriate personal and professional boundaries.

Staff should:

- Have no secret social contact with young people or their parents/carers/guardians.
- Consider the appropriateness of the social contact according to their role and nature of their work.
- Always approve any planned social contact with young people or parents/carers/guardians with their line manager.

- Advise their line manager of any social contact they have with a young person or their parents/carers/guardians with whom they work which may give rise to concern.
- Report and record any situation which may place a young person at risk or which may compromise CILEX Law School or their own professional standing.
- Be aware that sending of personal communication such as birthday or faith cards should always be recorded and discussed with a line manager.
- Understand that some communications may be called into question and need to be justified.

2.12 Sexual contact

All staff should clearly understand the need to maintain appropriate boundaries in their contact with young people. Intimate or sexual relationships between young people and the staff who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable. Any sexual relationship between a member of staff and a young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action.

Staff should not:

- Have sexual relationships with young people.
- Have any form of communication with a young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, email, phone calls, texts, physical contact.
- Make sexual remarks to or about a young person.
- Discuss their own sexual relationships with or in the presence of young people.
- Consistently confer inappropriate special attention and favour upon a young person as it might be construed as being part of a 'grooming' process.

Staff should:

- Ensure that their relationships with young people clearly take place within the boundaries of a respectful professional relationship.
- Take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought.

2.13 Physical contact

It is crucial that in all circumstances, staff should only touch young people in ways which are appropriate to their professional or agreed role and responsibilities.

Staff should:

- Be aware that even well-intentioned physical contact may be misconstrued by the young person, an observer or by anyone to whom this action is described.
- Never touch a young person in a way which may be considered indecent.
- Always be prepared to report and explain actions and accept that all physical contact may be open to scrutiny.

- Not indulge in horseplay.
- Work within Health and Safety regulations,
- Be aware of cultural or religious views about touching and always be sensitive to issues of gender and sexual orientation.
- Understand that physical contact in some circumstances can be easily misinterpreted.

2.14 Behaviour management

All young people have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour.

Staff should:

- Adhere to CILEX Law School's staff and student Code of Conduct and CILEX IT Policy and Procedures.
- Adhere to CILEX Law School's Escalation procedure and Malpractice Policy.
- Be mindful of factors which may impact upon a young person's behaviour e.g. bullying or abuse, and where necessary take appropriate action.

2.15 Students in distress

There are some settings where staff may be involved in managing significant or regular occurrences of distress and emotional upset in students, for example when dealing with learner support applications. For all other staff working with students there will be occasions when a distressed young person needs comfort and reassurance.

Staff should:

- Consider the way in which they offer comfort and reassurance to a distressed student and do it in an age-appropriate way.
- Be circumspect in offering reassurance in one-to-one situations, but always record such actions in these circumstances.
- Never touch a student in a way which may be considered indecent.
- Record and report situations which may give rise to concern from either party.
- Not assume that students seek physical comfort if they are distressed.

2.16 First Aid and the administration of medication

Due to CILEX Law School's delivery model, learners will not attend CILEX Law School's premises for any of their teaching, learning and assessments, however, they may be required, from time to time, to attend approved teaching and examination venues. Furthermore, staff visits to employer premises will be required for the purposes of training or assessment. Should first aid be required in either external approved venues or within a learner's workplace, CILEX Law School will contact the relevant First Responder (whether that be a member of CILEX Law School or the venue's staff). Any incidents requiring first aid must be communicated to the Head of Apprenticeships, Quality and Compliance at the earliest opportunity.

Staff should:

- Adhere to the venue/workplace policy for administering first aid or medication.
- Comply with the necessary reporting requirements.
- Explain to the young person what is happening.
- Always act and be seen to act in the young person's best interests.
- Report and record any administration of first aid or medication.
- Have regard to any health plan which is in place.

2.17 One to One Situations

As part of CILEX Law School's apprenticeship delivery model, one to one situations occur on a regular basis between the Learning and Development Advisors and the Apprentice.

Staff should:

- Ensure that when lone working is an integral part of their role, appropriate risk assessments have been conducted and agreed.
- Only meet with young people in an employer's premises or other venue agreed with the Head of Apprenticeships, Quality and Compliance. Avoid use of 'engaged', 'do not disturb' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.
- Always report any situation where a young person becomes distressed or angry to their line manager.
- Carefully consider the needs and circumstances of the young person when in one to one situations.

2.18 Transporting students

There should be no occasion when staff are expected or asked to transport students as part of their duties.

2.19 Photography and videos

Working with students may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of a student.

Staff should:

- Be clear about the purpose of the activity and about what will happen to the images when the activity is concluded.
- Be able to justify images of young people in their possession.
- Avoid making images in one to one situations or which show a single young person with no surrounding context.
- Ensure the student understands why the images are being taken and has agreed to the activity and that they are appropriately dressed.
- Only use equipment provided or authorised by CILEX Law School.

- Report any concerns about any inappropriate or intrusive photographs found.
- Always ensure that they have any necessary permission to take and/or display photographs.

Staff should not:

- Use images which may cause distress.
- Use their personal mobile phone to take images of students.
- Take images in secret, or take images in situations that may be construed as being secretive.

2.20 Access to inappropriate images and internet usage

There are no circumstances that will justify staff possessing indecent images of young people. Staff who access and possess links to such websites will be viewed as a significant and potential threat to young people. Accessing, making and storing indecent images of young people on the internet is illegal. This will lead to criminal investigation and the individual being barred from working with young people, if proven.

Staff should:

- Follow CILEX Law School’s guidance on the use of IT equipment.
- Ensure insofar as possible that young people are not exposed to unsuitable material on the internet including materials which could be seen as being used to draw young people into terrorism.
- Ensure that any films or material shown to young people are age appropriate.

2.21 Curriculum

Care should be taken to promote fundamental British values and be rigorously reviewed to ensure it is compliantly and consistently applied.

Staff should:

- take care when encouraging pupils to use self-expression, not to overstep personal and professional boundaries.
- be able to justify all curriculum materials and relate these to clearly identifiable delivery plans.

Staff should not:

- enter into or encourage inappropriate discussions which may offend or harm others.
- undermine fundamental British values.
- express any prejudicial views.
- attempt to influence or impose their personal values, attitudes or beliefs on students.

2.22 Whistle Blowing

Whistle blowing is the mechanism by which staff can voice their concerns that are about malpractice or misconduct without fear of repercussions.

Staff should:

- Report any behaviour by colleagues that raises concern regardless of source in line with the CILEX Whistleblowing policy.

2.23 Home visits

Under no circumstances should staff visit a student in their home outside agreed work arrangements or invite a student to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the member of staff must have a prior discussion with their line manager and the parents/carers/guardians and a clear justification for such.

Staff should:

- Agree the purpose for any home visit with their line manager.
- Adhere to agreed risk management strategies, which should always include two members of staff being in attendance.
- Always make detailed records including times of arrival and departure and work undertaken.
- Ensure any behaviour or situation which gives rise to concern is discussed with their manager and, where appropriate action is taken.

2.24 Sharing concerns and recording incidents

Staff should be aware of CILEX Law School's safeguarding procedures, including procedures for dealing with allegations against adults.

Staff should:

- Be familiar with CILEX Law School's system for recording concerns.
- Take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an apprentice.

This guidance document is based on the 'Guidance for safer working practice for those working with children and young people in education settings (October 2015)'.

Appendix 1

Staff with designated safeguarding responsibilities

| Name and job title | Safeguarding role | Contact details |
|---|--|---|
| Sagana Banumoorthy Student Wellbeing Manager | Designated Safeguarding Officer | Sagana.banumoorthy@cilexlawschool.ac.uk safeguarding@cilexlawschool.ac.uk +44 (0)1234 844324 |
| Samantha Lunn Head of Apprenticeship, Quality and Compliance | Deputy Designated Safeguarding Officer Senior Safeguarding Lead | samantha.lunn@cilexlawschool.ac.uk +44 (0)7833 673 680 |
| Simon Cohl Academic Director | Senior safeguarding champion Contact for concerns about staff | simon.cohl@cilexlawschool.ac.uk T: +44 (0)1234 417133 |

Appendix 2

Recognising abuse, neglect and exploitation

All staff should be aware that abuse, neglect and exploitation issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Staff should also be alert to the fact that abuse can come from other young people as well as adults. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting.

References in the definitions below are made to young persons, but all students and apprentices may be subject to abuse and exploitation

Abuse: a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. Young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another young person.

Physical Abuse 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 child they are looking after.

Emotional Abuse This involves the persistent emotional ill treatment of a young person such as to cause severe and persistent adverse effects on their emotional development. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. It may involve conveying that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed, or the exploitation or corruption of young people.

Sexual Abuse This involves forcing or enticing a young person to take part in sexual activities whether or not they are aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts. For example, it may also include involving the young or vulnerable person looking at, or being involved in the production of pornographic material or watching sexual activities or encouraging them to behave in sexually inappropriate ways. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Peer on Peer Abuse Abuse is abuse and should never be tolerated or passed off as “banter” or “just having a laugh”, as this can lead to a culture of unacceptable behaviours, an unsafe environment for young people and in worst case scenarios a culture that normalises abuse leading to young people accepting it as normal and not coming forward to report it. This type of abuse can take the form of sexual harassment or violence, physical abuse, sexting or initiation/hazing type violence and rituals. Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)

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

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. CSE may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Children Absent from Education Children absent from education are vulnerable to be exposed to abuse such as travelling to conflict zones, radicalisation, Female Genital Mutilation (FGM) and forced marriage. Unexplained or frequent absences should always be followed up to ensure they are not linked to any form of risk.

Children Criminal Exploitation: County Lines Organised criminal distribution of drugs from big cities into smaller towns and rural areas using children and vulnerable people (a form of CCE). This can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. The main county line gangs operate from London and Liverpool, but other groups work out of Birmingham and Manchester. Key to identifying potential involvement in county lines are missing episodes, when the victims may have been trafficked for the purpose of transporting drugs. County lines exploitation can also affect vulnerable adults.

Neglect This is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development such as failing to provide adequate food, shelter and clothing or neglect of or unresponsiveness to, a young person's basic emotional needs.

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 young people. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and or stress.

Financial or Material Abuse This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse of misappropriation of property, possessions or benefits.

Discriminatory Abuse This is an action that denies social participation or human rights to categories of people based on prejudice. CILEX LAW SCHOOL does not tolerate discrimination on any grounds.

Honour Based Abuse HBA encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, such as:

Forced Marriages These are marriage relationships conducted without the valid consent of both parties, where duress is a factor. If there are concerns that a learner is in danger of a forced marriage the Designated Safeguarding Officer will follow government guidelines and contact will be made with the "Forced Marriage Unit". Arranged marriage is an entirely separate issue and must not be confused with forced marriage.

Female Genital Mutilation (FGM) Female Genital Mutilation (FGM) is a form of child abuse which has devastating physical and psychological consequences for girls and women. It is illegal in the UK. There are a range of potential indicators that a girl may be at risk of FGM. If a member of staff has a concern regarding a girl that might be at risk of FGM they should inform the Designated Safeguarding Officer immediately. There is a mandatory reporting duty (under section 74 of the Serious Crime Act 2015), which places a statutory requirement upon teachers to report such cases relating to a girl under 18 to the Police.

Breast-Ironing This is the practice of “ironing” a girl’s chest with a hot stone to delay breast formation which is increasing in the UK. It is considered a traditional measure which prevents unwanted male attention, sexual harassment and rape. Medical experts regard this as child abuse which could lead to physical and psychological scars, infections, inability to breastfeed, deformities and breast cancer.

Cyberbullying This is the use of communication technology to torment, threaten, harass, humiliate, embarrass or otherwise harm an individual by sending or posting text messages or pictures intended to do so.

Bullying This may take many forms and is an act of aggression causing a person to feel threatened or intimidated because of those actions.

Drug Abuse This is the recurrent use of illegal drugs, or the misuse of prescription or over-the-counter drugs with negative consequences. These consequences may involve: problems at home or in interpersonal relationships; problems with the law; physical risks to health; and physical risks that come with using drugs in dangerous situations. Staff should always refer to the Designated Safeguarding Officer if they suspect a learner is involved in drug abuse.

Sexual Violence When referring to sexual violence, this policy refers to the sexual offences listed under the Sexual Offences Act 2003, including but not limited to rape, assault by penetration and sexual assault.

Sexual Harassment The unwanted conduct of sexual nature that can occur online or offline, and can include sexual comments, sexual remarks about clothes and appearance, sexual “jokes” or taunting, physical behaviour and online sexual harassment.

Homelessness Indicators that an apprentice may be at risk of homelessness include awareness of household debt, rent arrears, domestic abuse and anti-social behaviour and “sofa-surfing”.

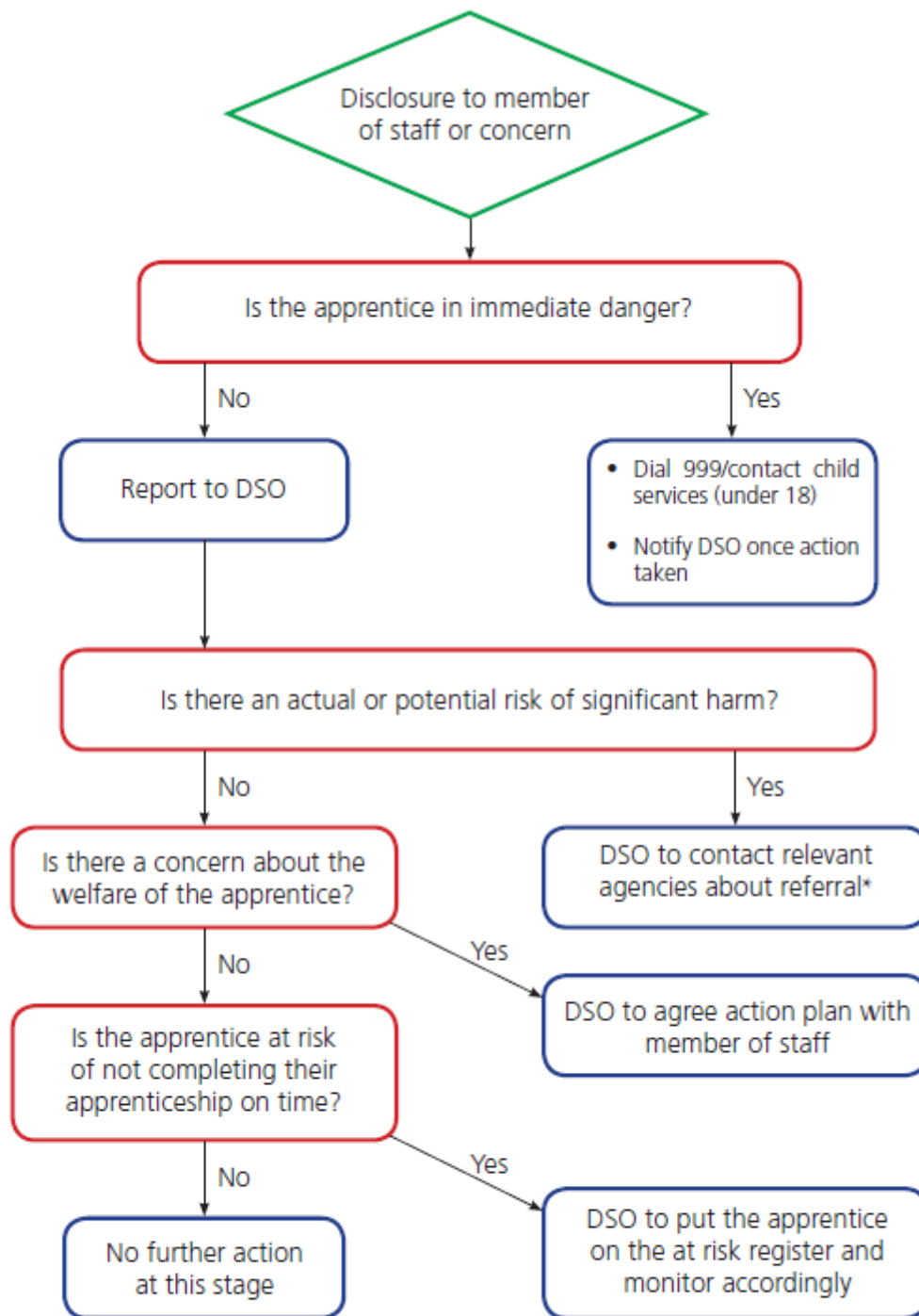
Mental health All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Radicalisation and extremism This can occur through methods such as social media or social settings and the home. Preventing radicalisation into extremist ideology is possible through intervention. Staff should use their judgement of those at risk of radicalisation and act proportionately notifying the designated Safeguarding Officer.

Serious Youth Violence is defined as ‘any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19’

Appendix 3

Flowchart of processes for reports and referrals: escalation process



* Refer to Child Protection & Safeguarding Policy for specific agency

Appendix 4

Important Numbers

| | | |
|--|--|--|
| Bedfordshire Children's Social Care Intake & Assessment Duty Desk | 01234 223599 | Mon – Thurs 8.45am – 5.20pm Fri 8.45am – 4.20pm |
| Social Care Emergency Duty Team | Contact MASH (see below) | |
| Police Child Abuse Investigation Unit | 01234 275207 | |
| Bedfordshire Designated Office for Safeguarding Children | 01234 292952 | Mon-Fri 9am – 5.20pm |
| LADO and Conference Chair Conference & Review Service Quality Assurance Cauldwell Street Borough Hall 5th Floor Bedford MK42 9AP | Tel: 01234 - 276693 /44693/0300 300 4833 Fax: 01234 - 228877 Secure email address: Lado@bedford.gcsx.gov.uk | 7 days a week 24 hours |
| Multi Agency Support Hub | Tel: 01234 718700 (office hours), 0300 300 8123 (out of hours). Email: multiagency@bedford.gov.uk | Mon –Thurs 8.50am – 5.20pm Fri 8.50 am – 4.30pm |
| National Society for the Prevention of Cruelty to Children (NSPCC) | 0808 800 5000 | 7 days a week 24 hours |
| Education Welfare Officer Borough Hall | 01234 228357 E-mail edwel@lea.bedfordshire.gov.uk Website: www.bedfordshire.gov.uk | Mon-Thurs 8.45am – 5pm Fri 8.45am – 4.45pm |
| Safeguarding Authority (ISA) referrals address: PO Box 181 Darlington DL1 9FA | Tel: 0300 123 1111 | |
| Beat Bullying | http://www.beatbullying.org | |

| | | |
|---|---|--|
| <p>A site for young people, parents employers and teachers to understand more about online/cyber bullying. This site also provides contact with counselors and mentors.</p> | | |
| <p>Further information is available from the following websites:</p> | <p>www.everychildmatters.gov.uk www.nspcc.org.uk www.ofsted.gov.uk</p> | |

Appendix 5

Data held in the CILEX Law School Safeguarding Register

1. Purpose

The purpose of the register is to collate key information on each safeguarding matter raised to the DSO or Deputy DSO to determine appropriate next steps intervention.

2. Safeguarding Data

The following data is stored in the register and this table highlights the reason why it is collected:

| Column | Reasoning |
|-------------------------|---|
| SG Code | This is the code assigned to each safeguarding concern for reference purposes |
| LDA | Name of the Learning and Development Advisor |
| Apprentice/Student | Name of the Apprentice/Student |
| Age | Age bracket the apprentice falls into |
| Start Date | Start date of the apprenticeship/programme |
| EED | Expected end date of the apprenticeship/programme |
| Date joined SGR | Date referred to DSO |
| Referred by | Who the referee is |
| Date left SGR | Date the apprentice/student left the SGR |
| Provider | Under which contract the apprentice/student is funded |
| Successfully Completed | Whether the apprentice/student successfully completed their programme (left blank for those still in learning) |
| If no, due to SG Issue? | If withdrawn or failed, details of whether this was due to the SG issue – further details on the withdrawal action plan and exit review |
| SG Issue | What the SG issue/s actually is/are |
| Next Intervention | What the next agreed intervention is and the scheduled date |
| Issue Code | Notes the type of SG issue which falls into mental health, family, harassment or other/unknown |
| SG Theme | Whether the SG issue is caused by the workplace or personal causes |
| Date Reviewed | The date of the updated review of the SG issue |
| Intervention Notes | Detailed notes of the specific intervention |