

Safeguarding Policy and Procedure – Institute of Art London Ltd

1. Policy Statement

- 1.1 This policy relates to all operations and educational programmes delivered in the UK by Institute of Art London Ltd (IOALL or “the organisation”) entities. This includes programmes from Sotheby’s Institute of Art – London, Vogue College of Fashion. This policy also applies to any programmes hosted in the UK in partnership with other institutions and/or offered at IOALL premises by other entities in the BrandEd group of companies (i.e., BrandEd Holdings LLC, a Delaware limited liability company, and its subsidiaries). “Employees” refers to all employees and contractors for IOALL and employees of BrandEd UK Services delivering services for IOALL or other BrandEd entities in connection with programmes covered by this policy.

This policy aims to ensure reasonable and effective steps are taken by the organisation to safeguard children, young people, and adults at risk, from abuse and neglect both through the provision of a safe environment and through the provision of effective and supportive mechanisms for responding to safeguarding concerns, disclosures, and allegations.

- 1.2 IOALL will do this by taking the following actions:

- seeking to make the organisation a safe and welcoming environment for all that is free from harm and all forms of prejudice, harassment, discrimination, and bullying.
- giving equal priority to keeping all children, young people, and adults at risk safe, regardless of their gender, gender identity, race, national origin, ethnicity, age, religion, or belief, sexual orientation, or disability. The organisation recognise that some individuals may be particularly vulnerable to abuse because of their needs or the impact of discrimination.
- giving all staff information, training, and guidance about how to recognise potential harm when it has occurred, how to respond appropriately and how to report it.
- making sure anyone can raise safeguarding concerns about any child, young person or adult at risk involved in the activities of the organisation.
- ensuring that staff are suitable to act in their roles, through the provision of relevant checks (including DBS) and appropriate training.
- ensuring that all programme staff are aware of their roles and responsibilities with respect to safeguarding and have received appropriate training to allow them to recognise and respond to all forms of abuse, neglect, and other concerns.
- ensuring there are staff with designated safeguarding responsibilities who are trained in responding to safeguarding concerns and disclosures and take a survivor-focused approach.
- having an appropriate referral system in place for dealing appropriately and effectively with serious safeguarding incidents, including reporting to the relevant external organisations, and providing support to those who raise or disclose the concern.

- recording, storing, and using information in line with data protection legislation and guidance.
- providing information about accessible support services to students, staff, volunteers and their families.

2. Purpose and Scope

- 2.1 IOALL is committed to protecting children and adults at risk from harm, exploitation and abuse, including individuals at risk of radicalisation, and to ensuring that all staff and students are aware of their responsibilities in relation to safeguarding, are alert to safeguarding concerns and know how to respond to those concerns.
- 2.2 IOALL is committed to ensuring the safety of everyone involved in their activities and aim to provide a safe environment for all students, volunteers and staff studying and working for and with us. This includes while staying in residential accommodation as part of any programme and for all visitors to its facilities.
- 2.3 Further, all Higher Education Providers have a duty to take reasonable and necessary steps to ensure that children and adults at risk are safe and that reasonably foreseeable harm does not occur because of careless acts, deliberate acts, or omissions. These measures are in addition to those required under general health and safety requirements or legislation.
- 2.4 It is expected that all individuals will conduct themselves with integrity, always upholding the reputation of the organisation and in line with the organisation's regulations, policies, and guidance.
- 2.5 When children of staff, students, volunteers, or visitors are present on any of our premises, they remain the responsibility of their parent/carer, unless engaged in official activities.
- 2.6 It is expected that all staff will be aware, through effective communication of this Policy and associated training, of how to recognise and respond appropriately to safeguarding concerns. Those with specific responsibilities as set out in this Policy are expected to have read and understood their responsibilities, to attend training, to ensure that appropriate records are kept relating to safeguarding matters and to ensure that local procedures/arrangements for meeting safeguarding responsibilities are kept up to date and are in line with this Policy.

3. Definitions

Student	Any individual enrolled on a programme of study delivered at 30 Bedford Square, London or by IOALL at another location
Staff	Any individual on a permanent or fixed-term contract of employment with IOALL or BrandEd UK Services
Safeguarding	The protection of children and adults-at-risk from abuse and neglect
Child or Young Person	Any individual who has not yet reached their 18th birthday
Adult-at-risk	Any individual who is aged 18 years or over and at risk of abuse or neglect

	because of their needs for care and/or support who may be unable to protect themselves against significant harm or exploitation
Abuse	The violation of an individual's human and civil rights by any other person or persons
Neglect / Self-neglect	The persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of a person's health or development
Radicalisation	The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

3.1 Types of situations from which children, young people and adults at risk should be safeguarded include, but are not limited to, the following:

- financial exploitation
- sexual harassment, abuse, or exploitation
- physical, emotional, or psychological abuse
- recruitment to radical extremist ideologies and/or organisations
- enticement into illegal activities
- domestic abuse
- neglect
- cyber abuse
- modern day slavery
- bullying, harassment, or victimisation
- forced marriage
- female genital mutilation
- discrimination

4. Responsibilities

4.1 IOALL has a diverse staff, student, and visitor population, which provides predominantly an adult learning environment. However, there are circumstances when children, young people and adults at risk may interact with staff and students during its activities.

4.2 These include, but are not limited to:

- teaching, supervision, and support of students including use of the library
- whilst the organisation is hosting activities by other BrandEd providers
- outreach or widening participation activities taking place on or off campus
- research activities
- public events and conferences
- placements and other professional activities
- field trips, excursions, and other volunteering activities

4.3 Appendix 3 contains guidance on good practice when working with individuals under the age of 18.

4.4 IOALL has a duty of care to staff, students and visitors and are responsible for ensuring appropriate policy, procedures, guidance, risk assessment, action planning and training are in place to facilitate effective safeguarding of children, young people, and adults at

risk. This includes ensuring we take reasonable steps to ensure that contractors understand, accept and are responsible for their, or their employees' conduct.

- 4.5 Anyone undertaking a paid or unpaid role for IOALL has a responsibility to be aware of this policy and to understand how and where to raise safeguarding concerns.
- 4.6 The IOALL Governing Body has ultimate responsibility/accountability, including for putting things right. It does so by:
- approving the IOALL Safeguarding Policy
 - receiving assurance that staff are trained to the appropriate levels
 - receiving their own training
 - having a designated member with specific oversight of safeguarding, who is notified by the Chief Safeguarding Officer of any safeguarding cases
 - receiving the outcomes of periodic reviews
- 4.7 The Audit Committee receives annual reports from the Safeguarding Steering Group (see appendix 1 for membership).
- 4.8 The Chief Safeguarding Officer is responsible for:
- recommending the Safeguarding Policy to the Governing Body for approval
 - ensuring the proper implementation of this policy across the organisation
 - submission of reports to the Office for Students (OfS) if deemed to be a reportable event.
 - ensuring adequate resources are in place to enact the requirements of this policy.
 - Ensuring appropriate appointments of Senior Safeguarding Leads (SSLs) and Deputy Safeguarding Leads (DSLs)
- 4.9 Senior Safeguarding Leads (SSLs) are responsible for ensuring legal and regulatory compliance and for ensuring this Policy is implemented. They are the primary Safeguarding Lead for the area of the organisation they work for. Their responsibilities include handling day-to-day matters, record management, communication about this policy with students and parents, ensuring that all staff undertake appropriate training, and determining the response to all raised concerns. They are responsible for:
- ensuring the Safeguarding Policy is kept up to date, is accompanied by appropriate formal procedural arrangements and is implemented across the organisation.
 - ensuring that all staff, students, and volunteers familiarise themselves with the organisation's Safeguarding Policy, understand their responsibilities, and are appropriately trained to deal with safeguarding incidents.
 - supervision of investigations of allegations and other disclosures
 - the appointment of the Deputy Safeguarding Leads (DSLs)
 - investigating and remedying any apparent non-compliance with this policy at the organisation
 - ensuring effective communication of the Safeguarding Policy and Procedure, including communicating changes to it
 - ensuring appropriate training is provided to all staff, commensurate with their role and responsibilities, and for ensuring the training is evaluated and kept up to date.
 - where appropriate, ensuring that any relevant safeguarding checks (including DBS checks) for staff and students have taken place.

- ensuring contractors of the organisation comply with the provisions of this Policy.
- ensuring appropriate mechanisms are in place for recording and reporting safeguarding incidents and near misses (in accordance with the organisation's Data Protection Policy)
- holding the central records of safeguarding incidents
- ensuring required risk assessments are conducted, appropriate and acted upon
- attending high level training commensurate with the responsibilities of an SSL
- chairing the Safeguarding Steering Group
- ensuring the Governing Body member with oversight of safeguarding is notified when a case occurs.
- providing reports to the Governing Body and its subcommittees as necessary

4.10 Deputy Safeguarding Leads (DSLs) are identified for specific activities and ensure appropriate safeguarding arrangements are in place relating to those activities. They support the Senior Safeguarding Lead (SSL) in execution of their activities and serve as the safeguarding lead if the Senior Safeguarding Lead is unavailable or unable to fulfil the role. They are responsible for:

- acting as the identified contact for responding to safeguarding concerns or allegations raised during the organisation's activity.
- ensuring any safeguarding concerns and incidents are appropriately recorded and reported to the Senior Safeguarding Lead
- ensuring safeguarding activities across the organisation are consistent and compliant with this policy.
- contributing to the investigation of causes for concern when raised under the Safeguarding Policy
- assisting in the management of safeguarding incidents, including referrals to local agencies and/or referrals to internal procedures as appropriate
- contributing to any investigation meetings
- providing advice to others on safeguarding concerns and handling of incidents
- assisting in the promotion of the Safeguarding Policy and written procedure
- attending high level training commensurate with the responsibilities of a DSL
- assisting in the delivery of training to staff where appropriate
- on occasion, the DSL may be asked by the SSL to respond to safeguarding concerns or incidents.

4.11 All staff, and students, freelance practitioners, student representatives, alumni and any associated personnel acting as representatives of the organisation) are responsible for:

- helping to ensure the organisation is a safe environment, free from prejudice, discrimination, bullying and harassment by ensuring compliance with the expected behaviours and values of the organisation.
- ensuring they understand the Safeguarding Policy and how to raise a safeguarding concern or disclosure under it.
- attending training relating to safeguarding as requested.
- ensuring safeguarding responsibilities are reflected in planning and risk assessments for activities of the organisation
- co-operating fully with any internal or external investigations carried out into reported concerns.

- reporting any concerns, suspicions, or information regarding safeguarding violations to the appropriate staff
- maintaining the confidentiality of any suspected or actual incidents
- ensuring they are aware of local safeguarding policies and procedures for the premises they are visiting when representing the Institute, for example when visiting other organisations.

4.12 All students have the responsibility to behave in a respectful manner towards each other as outlined in their student handbooks; students are advised to report any bullying or abusive behaviour that they witness to a staff member that they feel most comfortable approaching.

5. Reporting Procedure

5.1 If staff become aware that a child or adult at risk is, or may be, experiencing abuse or neglect, they should promptly discuss this with their SSL or DSL who will advise of next steps.

5.2 Situations that could trigger a safeguarding concern include:

- Witnessing harm/neglect
- Disclosure of abuse or neglect, either current or historic
- Reasonable suspicion of abuse or neglect
- Disclosure of, or witnessing, radicalisation

5.3 Staff should not assume that someone else will take action. Staff should be aware that early sharing of information is often vital to enable an effective intervention that might keep a child or adult at risk safe.

5.4 It is not a staff member's responsibility to decide whether a child, young person or adult at risk has been abused or harmed or subjected to abuse or harm, only to raise concerns that they may have.

5.5 Identifying abuse or exploitation can be difficult, but there are several ways in which this might become apparent:

- disclosure of the abuse – self disclosure or disclosure by a third party. This might be full disclosure or that which raises suspicions of abuse.
- signs of abuse, including physical injury for which there appears to be no satisfactory explanation.
- behaviour that leads to a suspicion that someone is being or has been abused or exploited.

Responding to Safeguarding Concerns

5.6 The safeguarding procedure is to be followed whenever a concern is raised or a disclosure made that a child, young person, or adult at risk may be a victim of abuse or exploitation. It should not be used if someone is in immediate danger, in which case the emergency services should be called.

- 5.7 Where any employee of the organisation becomes aware of a possible safeguarding concern or receives a disclosure or an allegation they should:
- listen carefully to the person and keep an open mind. Staff should not question whether the abuse has taken place and be aware of non-verbal messages.
 - ask open-ended questions. Staff should not ask leading questions, that is, a question which suggests its own answer. Do not stop a person who is freely recalling significant events. Keep responses short, simple, quiet, and gentle.
 - reassure the person and let them know that they have done the right thing by telling you.
 - be aware of non-verbal messages.
 - explain that they may need to pass the information to the Senior Safeguarding Lead who will ensure that the correct action is taken. Do not promise confidentiality.
 - if possible, make a written report of all the relevant details: date, time, place of conversation, name, student number (if relevant), detail(s) of the person raising the concern, reasons for the cause for concern including any specific incidents, actions, or observations, essence of what was said and done by whom and in whose presence
- 5.8 The employee must report the concern to the relevant Senior Safeguarding Lead or Deputy Safeguarding Lead without delay. If the concern has been reported to the DSL, the DSL must also inform the SSL for the appropriate area of the organisation. The DSL or SSL will then be responsible for responding to and managing the report. They will reach a decision on what action is required appropriate to the person's safeguarding needs and the situation, including referral to external agencies where appropriate.
- 5.9 If there are immediate concerns of risk of harm or abuse, then the employee should contact the emergency services. The employee should also verbally notify the SSL or DSL as soon as reasonably practical, and a Safeguarding Report Form completed as soon as possible thereafter.
- 5.10 If the primary SSL or DSLs for the relevant area of IOALL cannot be contacted immediately, the employee will need to take a decision as to whether the matter can wait or whether urgent action needs to be taken to safeguard the individual concerned.
- 5.11 Depending on the circumstances of the case and who is involved, the SSL or DSL may also need to refer the matter under the relevant company policies (see section 11 for list of related policies).
- 5.12 Any concerns about the behaviour by a member of staff against a child or an adult at risk should be reported directly to the SSL, if available, and referred to Human Resources.

Steps SSL / DSL will take

- 5.13 Before taking further action, the SSL / DSL will first establish that the person identified as having a safeguarding concern meets the definition of being a child or adult at risk (see definitions in section 3). If these definitions are not met but the person identified requires support, they will be referred to the appropriate internal or external services.

- 5.14 The SSL / DSL will take appropriate steps which could include one or more of the following:
- to consult with relevant colleagues to ensure all relevant facts have been gathered.
 - to liaise with appropriate external partners e.g., appropriate staff in a school within which outreach activities are happening, a placement provider, an apprenticeship student's employer.
 - to arrange for the individual to be given appropriate support via internal or external services.
 - to make a referral to local social services
 - to contact the police.
- 5.15 It is important that accurate records are kept in relation to all safeguarding concerns that are raised. Where it is necessary to share information with other agencies in order to address the risk of harm, this will normally be done by the SSL, using the form in appendix 5.
- 5.16 However, in an emergency, where risk is imminent, any member of staff can call the emergency services. All records will be kept securely and retained only as long as necessary, in line with the organisation retention schedule.

Reporting

- 5.17 The organisation is responsible for ensuring that it maintains accurate records of safeguarding concerns, allegations, and disclosures in accordance with the organisation's Data Protection Policy. The Senior Safeguarding Lead is responsible for ensuring mechanisms for appropriate recording are in place and for onward (anonymised) reporting into the organisation's Audit Committee and Governing Body.
- 5.18 To ensure the safety and welfare of all children, young people and adults at risk, information will be shared with external organisations who will be involved in addressing the safeguarding concern (this may include other educational providers, the local authority and the police). Every effort will be made to gain the consent of the individual prior to sharing information but information may be shared without consent where there is good reason to do so. The child, young person or adult at risk should be advised that the information will be shared with those who will address the concern. The organisation's record will include who has been given the information and why.
- 5.19 The organisation may become involved in activities which include external children, young people and adults at risk. For some of these activities, it is likely that the Safeguarding Policy of another organisation may need to be followed.

Record Keeping

- 5.20 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing, even when referral is not appropriate immediately. Records should be completed as soon as possible, and in any event on the same day the incident/event is reported to the staff member. Information should be kept confidential and stored securely and in accordance with the organisation's Staff and/or Student

Privacy Notice. All child protection records will be kept separately from the main student file (if the disclosure relates to a student).

5.21 Records should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

6. Allegations against Staff and Students

6.1 The organisation takes all allegations that there has been a breach of this safeguarding policy seriously. The process by which an allegation against a member of staff may be managed is addressed in the staff disciplinary procedure. The SSL will notify the Director of Human Resources. If the allegation is against a student, the student disciplinary policy will apply.

6.2 Allegations that a person working with children has behaved in a way that has or may have harmed a child or possibly committed a criminal offence against or related to a child should be reported to the SSL within one day of such an allegation being made.

7. Safer Recruitment and Vetting

7.1 All staff who have regular interaction with children and vulnerable adults will have appropriate background checks completed before they are allowed to begin working with children and vulnerable adults involved with the relevant activity. This includes instructional staff and any other staff who have more than incidental interaction with children – this is defined as more than 3 days in a 30-day period or overnight supervision (regulated activity).

7.2 The checks are:

- Enhanced DBS check and Barred List check
- Before employment begins, validated reference and qualification checks specifically indicating the candidate suitability to work with children.

Disclosure and Barring Service (DBS checks)

7.3 BrandEd may request a DBS check as part of our recruitment process for vacancies across all Schools. These checks are processed by the Disclosure and Barring Service (DBS).

7.4 The types of check are as follows:

- a basic check, which shows unspent convictions and conditional cautions
- a standard check, which shows spent and unspent convictions and adult cautions, from the Police National Computer which have not been [filtered in line with legislation](#)
- an enhanced check, which shows the same as a standard check plus any information held by local police that's considered relevant to the role

- an enhanced check with a check of the barred lists, which shows the same as an enhanced check plus whether the applicant is on the adults' barred list, children's barred list or both

7.5 Applicants (job candidates) cannot carry out a standard or enhanced check on themselves.

The level of check that can be made is prescribed by the DBS and is dependent on the role. For more information, please visit [DBS checks: detailed guidance - GOV.UK](#)

8. Staff Training

8.1 Staff members who have responsibility for safeguarding, and are involved in [regulated activity](#) (predominantly teaching, training, instructing, caring, or supervising under 18s, including overnight supervision) will receive level 2 safeguarding training. This is to ensure that those individuals have a thorough understanding of the safeguarding policy as well as safeguarding all children involved with the organisation's programmes.

8.2 All other staff members will complete a basic level 1 safeguarding course so they are aware of their general safeguarding duty and what factors to look out for when someone might be being abused or is at risk of harm/abuse.

8.3 The Senior Safeguarding Leads (SSLs), Deputy Safeguarding Leads (DSLs) and those staff with a school Director or division oversight role will complete level 3 safeguarding training and/or safeguarding training equivalent specifically for DSLs. This training will be refreshed every 3 years.

8.4 All presenters, guest speakers and incidental contractors who are responsible for teaching, training, instructing, caring, or supervising children under 18 will be provided with the staff and student code of conduct, and will always be accompanied by another staff member who has completed safeguarding training.

9. Student Information & Parental Consent

9.1 All parent/guardian(s) of enrolled students under the age of 18 must complete, sign, and return a parental consent form. Enrolment procedures offer the opportunity for the student and parent/guardian to inform the organisation of any medical conditions, disabilities, or educational needs of the student. This information is confidential and may only be accessed by staff members on a need-to-know basis. Full next of kin details for all students are required prior to arrival in case of any emergency.

10. Equal Opportunities and Safeguarding

10.1 Some individuals may be vulnerable to an increased risk of abuse. It is important to understand that this increase may be due to societal attitudes and protection procedures that fail to acknowledge the individual's diverse circumstances, rather than the individual's personality, impairment, or circumstances.

- 10.2 Many factors can contribute to an increase in risk, including prejudice and discriminations, isolation, social exclusion, communication issues, learning disabilities and reluctance on the part of some adults to accept that abuse can occur.
- 10.3 Staff should be aware of these risks and will give special consideration to individuals who are disabled or have special educational needs; vulnerable to being bullied, or engaging in bullying, vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, or sexuality; or do not have English as a First Language.

11. Associated Policies and Procedures

Sotheby's Institute of Art - London

- Harassment, Bullying, Sexual Misconduct and Victimisation Policy and Procedure
- Equality, Diversity, and Inclusion Policy
- Cause for Concern Guidance
- Fitness to Study Policy
- Disability Policy
- Student Complaints Procedure
- Student Misconduct and Academic Malpractice Policy
- Staff Disciplinary Policy and Procedure

Vogue College of Fashion

- Staff Disciplinary Policy and Procedure
- Equal Opportunities Policy
- Fitness to Study Procedure
- Students with Disabilities Policy
- Student Welfare Policy
- Student Code of Conduct Policy
- Student Complaints Policy
- Abusive Behaviour Policy
- Non Discrimination Policy

Manchester City Sports Business School

- Student Code of Conduct
- Health and Safety Policy
- Equalities and Special Education
- Student Privacy Notice
- Student Complaints Procedure
- Staff Disciplinary Policy and Procedure

12. Continuous Monitoring

- 12.1 The policy will be reviewed annually, following any changes in legislation and/or government guidance, or because of any other significant change or event. The review will be undertaken by the Senior Safeguarding Leads in consultation with key staff members.

If the organisation becomes aware of any safeguarding issues or incidents, this policy may be reviewed and amended, as necessary.

Policy Owner: Senior Safeguarding Leads

Policy Approved by: IOALL Governing Body on 12 June 2025

Equality Impact Assessment Date: Planned for May 2026

Version number: 1

Date of next review: June 2026

Appendix 1

Chief Safeguarding Officer

- Jonathan Woolfson

Senior Safeguarding Leads and primary areas of responsibility / Safeguarding Steering Group:

- Joanna Mills-Foy: Sotheby's Institute of Art, London
- Dione Hyland: Vogue College of Fashion
- Mieke Berg: BrandEd Pre-college and Collegiate Programmes

Deputy Safeguarding Leads and primary areas of responsibility:

Sotheby's Institute of Art, London

- Dawn Ashdown-Harris
- David Bellingham

Vogue College of Fashion

- Katie Pope

BrandEd Pre-College and Collegiate Programmes

- Helen Reed

BrandEd Human Resources

- Audrey Parr
- Nicola Lowe

Appendix 2

Indicators of abuse and neglect

- Abuse and neglect can take many forms, and we should not be restricted to an individual's view of what constitutes abuse or neglect. Circumstances of an individual case should always be considered.
- Abuse may be single or repeated acts, opportunistic or a form of serial abuse where the perpetrator seeks out and "grooms" individuals, an act of neglect or failure to act, multiple in form (many situations involve more than one type of abuse); deliberate or the result of negligence or ignorance or it could be a crime.
- For the purposes of this policy, abuse is categorised as follows:
 - Physical includes assault, hitting, slapping, misuse of medication, restraint. Visual signs – unexplained bruising, burns, dressing to cover injuries even in hot weather, change in personality, flinching, violent behaviour or talking about physical abuse.
 - Sexual includes rape, indecent exposure, sexual assault, sexual acts, sexual harassment, inappropriate touching, looking, sexual teasing or innuendo, sexual photography, a change in character, being over sexual for their age and withdrawing from physical contact, subjection to pornography or witnessing sexual acts to which they did not consent.
 - Psychological / Emotional includes threats of harm, abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable withdrawal of services or support networks.
 - Neglect includes ignoring medical, emotional, and physical care needs, such as medication, safety, education, adequate nutrition, or heating.
 - Self-neglect includes a person neglecting to care for their own personal hygiene, health or surroundings, or an inability to provide essential food, clothing, shelter, or medical care necessary to maintain their physical and mental health, emotion wellbeing and general safety.
 - Discrimination including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment because of race, gender and gender identity, age, disability, religion or because someone is gay, bisexual or transgender. This includes racism, sexism, ageism, homophobia, or any hate crime.
 - Domestic abuse: an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse by someone who is or has been a family member. This includes psychological/ emotional, physical, sexual, financial abuse or so call "honour" based violence, forced marriage or Female Genital Mutilation (FGM).
 - Financial or material includes fraud, theft, internet scamming, exploitation, coercion in relation so a vulnerable adult's financial affairs, including communication with wills, property inheritance, possessions, or benefits.
 - Modern slavery includes slavery, trafficking, forced labour.
 - Institutional includes poor care practice within an institution or organisation or care given at home ranging from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes, and practices within an organisation.

- Radicalisation includes where an individual has been radicalised by others, which may lead to acts of crime, terrorism, or harm to others.
 - Peer-on-peer abuse is when children abuse other children and can take many forms. Peer-on-peer abuse must never be tolerated or passed off as 'banter,' 'just having a laugh,' 'boys being boys' or 'part of growing up.' Victims of peer abuse will be treated as in all other cases of abuse, by having their allegations listened to and fully investigated.
- With regards to child-on-child sexual violence and sexual harassment, the organisation will follow the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or a group of children. Staff should be aware that girls, children with special needs and LGBT children are at greater risk.

Appendix 3

Guidelines for Programmes working with under 18's

Those associated with programmes or activities working with children under the age of 18 should observe the following to maintain a safe and positive experience for programme participants, encourage parent/guardian confidence and avoid misunderstandings. The guidelines are not meant to inhibit medical (physical or mental) or other professional interactions with children where professional standards apply.

DO:

- maintain the highest standards of professional behaviour when interacting with children
- wherever possible try to have another adult present when you are working with children in an unsupervised setting.
- conduct necessary one to one interaction with children in a public environment where you can be observed and interrupted.
- maintain an attitude of “it could happen here”; listen and interact with children, provide appropriate praise and positive reinforcement.
- ensure children know that there are staff – and who they are – that they can approach if they are worried or in difficulty.
- treat all children in a group consistently and fairly, with respect and dignity.
- be friendly with children within the context of a formal programme or activity while maintaining appropriate boundaries.
- maintain discipline and discourage inappropriate behaviour by children, consulting with supervisors if you need help.
- follow escalation procedures.
- be aware of how your actions and interventions might be perceived and could be misinterpreted.
- consult with other colleagues or supervisors if you are unsure.
- dress in ways that are appropriate to your role. Clothing should not be revealing, provocative or give rise to misunderstanding or political/cultural offense.
- follow escalation procedures if you encounter children with drugs or alcohol.
- be familiar with the signs and types of abuse as laid out in appendix 2.

DO NOT:

- spend significant time alone with one child away from the group or conduct private interactions with children in enclosed spaces or behind closed doors.
- have any physical contact with children, not even any efforts to console or comfort students, especially in private locations. When a child is in distress, staff should comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries.
- use inappropriate language, tell suggestive jokes, or make sexually suggestive comments around children, even if children themselves are doing so.
- wear clothing that is sexually provocative or could give rise to misunderstandings or political/cultural offence.
- give personal gifts or do special favours for a child or do things that may be seen as favouring one child over others.

- share information with children about your private life or have informal or purely social contact with children participating in the programme outside of programme activities.
- drive students in a vehicle unless accompanied by another member of staff.
- strike or hit a child or use any other punishment involving physical pain or discomfort.
- relate to children as though they were peers, conduct private correspondence or take on the role of confidant (outside of a professional counselling relationship)
- meet children outside of the parameters of programme activities.
- date or become romantically involved with a child. Do not show pornography to children.
- communicate in any fashion (phone, text, email, social media) with children outside of methods sanctioned and supported by the organisation. Where communications are used, ensure a second staff member is included in all communications.
- provide drugs, alcohol or tobacco (including vapes) to children or use them in the presence of children.

Appendix 4

Safeguarding Incident Report Form

Report Form	
Name of individual the concern is about:	Individual's programme of study/activity and brand:
Individual's email:	Individual's tel:
Individual's current living address:	
Date, time, and place of the incident:	
Names of any other individuals who have been made aware of this incident:	
Name of individual making this report:	Date of this report:
Contact details:	
Brief details: (what happened, who was involved, how you heard about this/ other relevant information including action taken):	
Action taken: External agencies contacted: Y/N 999 or social services? Y/N	
If yes, please give the name and contact details of anyone spoken to:	

A copy of this form should be sent to the Senior Safeguarding Lead as soon as possible but after any urgent or emergency calls that you feel need to be made.