



# **Greenhead College Corporation**

## **Safeguarding Policy**

**2023 -2024**

**Approved: December 2023**



**Kirklees Safeguarding Children Partnership**

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This policy reflects the Model Kirklees Safeguarding and Child Protection Policy and the West Yorkshire Consortium Safeguarding Children Procedure and should be read in conjunction with Part 1 Keeping Children Safe in Education 2023.

#### Named personnel with designated responsibility for Safeguarding

| Academic year | Designated Safeguarding Lead | Deputy Designated Safeguarding Lead (DDSL) and the Safeguarding team  | Nominated Governor | Chair of Governors |
|---------------|------------------------------|---|--------------------|--------------------|
| 2023-24       | Usman Anwar                  | Magdaline Glynn (DDSL), Anna Shaw, Diane Beaven, Mo Bunter, John Clyde-Evans, Matthew Burrows, Siobhan Corby, Sharon Stamp, Alison Moody & Vicky Rhodes | Jeanette Palmer    | Richard Armstrong  |

#### Key dates

| Policy Review date | Date Ratified by Governors | Date Shared with Staff |
|--------------------|----------------------------|------------------------|
| December 2023      | December 2023              | December 2023          |

# 1. Aims

The College aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote students' welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- The Governing Body and staff of Greenhead College (hereinafter referred to as "our College") take as our first priority the responsibility to safeguard and promote the welfare of our students, to minimise risk and to work together with other agencies to ensure rigorous arrangements are in place within our College to identify, assess and support those children who are suffering harm and to keep them safe and secure whilst in our care
- The responsibilities set out in this policy apply (as appropriate) to all members of the College community including students, staff, governors, visitors/contractors, volunteers and trainees working within the College. It is fully incorporated into the whole College ethos and is underpinned throughout the teaching of the curriculum, within the tutorial programme and within the safety of the physical environment provided for the students

# 2. Legislation and Statutory Guidance

- This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education 2021](#), [Working Together to Safeguard Children \(WTTSC 2018\)](#) and [sexual violence and sexual harassment between children in schools and colleges](#) and we comply with this guidance and the procedures set out by our Local Safeguarding Children partnership
- The policy conforms to locally agreed inter-agency procedures and has been developed by Kirklees Education Safeguarding Service and Kirklees Safeguarding Children's Partners. It is available to all interested parties on our website and request from the main College reception. It should be read in conjunction with other relevant policies and procedures and Keeping Children Safe in Education
- This policy is also based on the following legislation:
  - Section 175 of the [Education Act 2002](#), which places a duty on colleges, schools and local authorities to safeguard and promote the welfare of pupils
  - [The School Staffing \(England\) Regulations 2009](#), which sets out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
  - [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- General Data Protection Act (2019) [Guide to the General Data Protection Regulation - GOV.UK](#)<https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>
- Data Protection Act <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [Guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Guidance for safer working practice for those working with children and young people in education settings ([GSWP](#)) ([Safer Recruitment Consortium May 2019](#))
- Kirklees Safeguarding Children Partnership Procedures <https://www.kirkleessafeguardingchildren.co.uk/procedures-local-protocols-and-guidance/>
- Children Missing Education – Statutory guidance for local authorities (DfE September 2016) <https://www.gov.uk/government/publications/children-missing-education>
- [Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

### 3. Definitions

**Safeguarding and promoting the welfare of children means:**

- 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
- Taking action to enable all children to have the best outcomes
- **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm
- **Children** include everyone under the age of 18. College students over the age of 18 are supported by adult services when reporting any Safeguarding concerns. Adult services can be contacted via the link below

<https://www.kirklees.gov.uk/beta/social-care/contact-adult-social-care-services.aspx>

### 4. Equality Statement

Some students have an increased risk of abuse, and additional barriers can exist for some students with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise students' diverse circumstances. We ensure that all students have the same protection, regardless of any barriers they may face.

**We give special consideration to pupils who:**

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of Female Genital Mutilation (FGM), sexual exploitation, criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers, refugees or migrants

## 5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff (including those not directly employed by this College), volunteers, and governors in this College. Our policy and procedures also apply to extended College and off-site activities

### All staff

- All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#) (KCSiE) and review this guidance at least annually

### All staff will be aware of:

- Our systems which support safeguarding, including Guidance for Safer Working Practice, the role of the Designated Safeguarding Lead (DSL), the Re-engagement policy, and the safeguarding response to students who go missing from education.
- The process for reporting safeguarding concerns (Appendix 1).
- The early support process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to Kirklees children's services duty and advice and for statutory assessments that may follow a referral, including the role they might be expected to play. (Fig 1 page 10) illustrates the procedure to follow if you have concerns about a child's welfare. Wherever possible, speak to the DSL, deputy DSL, any member of the safeguarding team or Principal (in the absence of a DSL) first to agree a course of action. In the absence of a DSL, Deputy DSL, any member of the Safeguarding team or Principal being available, staff must not delay in directly contacting duty and advice team or the police if they believe a child is at immediate risk of significant harm.
- We work in partnership with other agencies in the best interests of the children. Requests for service to children's social care duty and advice team should (wherever possible) be made by the Designated Safeguarding Lead. Where a student already has a child protection social worker, we will immediately contact the social worker involved or in their absence, the team manager of the child protection social worker.
- What to do if they identify a safeguarding issue or a student tells them they are being abused or neglected, including specific issues such as female genital mutilation (FGM), and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- In College procedures for recording any cause for concerns and passing information on to DSLs in accordance with College's recording systems.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), female genital mutilation (FGM) and radicalisation.

**Appendix 2 details different kinds of abuse.**

**Appendix 3 provides guidance to staff on how to handle disclosures**

### **The Designated Safeguarding Lead (DSL) and deputy designated staff:**

- Our DSL is Usman Anwar. The DSL takes lead responsibility for child protection and wider safeguarding (including online safety and understanding the filtering and monitoring systems in place)
- During term time, the DSL will be available during College hours for staff to discuss any safeguarding concerns
- The DSL can also be contacted out of College hours at [uanwar@greenhead.ac.uk](mailto:uanwar@greenhead.ac.uk)
- When the DSL is absent, Magdaline Glynn (deputy DSL and Assistant Principal) will act as cover and be contacted at [mglynn@greenhead.ac.uk](mailto:mglynn@greenhead.ac.uk)
- If the DSL and deputy are not available, Mo Bunter (Deputy Principal) will act as cover and can be contacted at [mbunter@greenhead.ac.uk](mailto:mbunter@greenhead.ac.uk)
- **The staff procedure for reporting student safeguarding concerns is outlined in Appendix 1**

### **The DSL will be given the time, training, resources and support to:**

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of students
- Refer suspected cases, as appropriate, to the relevant body (children's social care duty and advice team, Channel programme, and/or police), and support staff to comply with their mandatory reporting duties in cases where Female Genital Mutilation has been identified
- Usman Anwar will ensure that all staff involved in direct case work of vulnerable pupils, where there are child protection concerns/issues, have access to regular safeguarding supervision
- The DSL will also keep the Principal informed of any issues, and liaise with local authority officers and relevant professionals for child protection concerns as appropriate
- We will ensure representation at appropriate inter-agency meetings such as Initial and Review Child Protection Conferences, and Planning and Core Group meetings, as well as team around the family meetings (TAF)
- Provide reports as required for meetings. If we are unable to attend a meeting, a written report will be sent. Reports will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting
- Where a student in College is subject to an inter-agency child protection plan or any multi-agency risk management plan, the Designated Safeguarding Lead will contribute to the preparation, implementation and review of the plan as appropriate

**The full responsibilities of the DSL are set out in Annex C of Keeping Children Safe in Education (KCSiE) – Role of the designated safeguarding lead. All Designated Safeguarding Leads and deputy Safeguarding Leads must read and comply with this.**

[https://www.gov.uk/government/publications/keeping-children-safe-in-education--2\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)



## The Governing Body

- The Governing body will complete appropriate safeguarding and child protection (including online) training at induction
- The Governing body will approve this policy at each review and hold the Principal to account for its implementation
- The Governing body will appoint a lead governor to monitor the effectiveness of this policy in conjunction with the full Governing body. The DSL cannot also be the lead governor with responsibility for child protection
- In the event that an allegation of abuse is made against the Principal, the Chair of Governors will act as the 'case manager'
- The Governing body, along with the College's senior leadership team are committed to safeguarding its students even if they are placed in alternative provision for a period of time within the College day/week. For work shadowing and volunteering placements and off-site enrichment activities, providers are asked to confirm that they have the appropriate health and safety policies and risk assessment procedures. Providers are also made aware of our Safeguarding Policy, which can be found on the College's website ([www.greenhead.ac.uk/policies/63.html](http://www.greenhead.ac.uk/policies/63.html)).

For work shadowing placements, employers are advised, where feasible, that they should avoid situations where they are alone with our students. Should the opportunity for an off-site visit arise employers are requested to seek parental permission when being transported by the employer

**The full responsibilities of the governing body are set out in Part Two of KCSiE – The management of safeguarding. All governing bodies should read Part Two of KCSiE in order to ensure that the College is fully compliant with their statutory safeguarding responsibilities.**

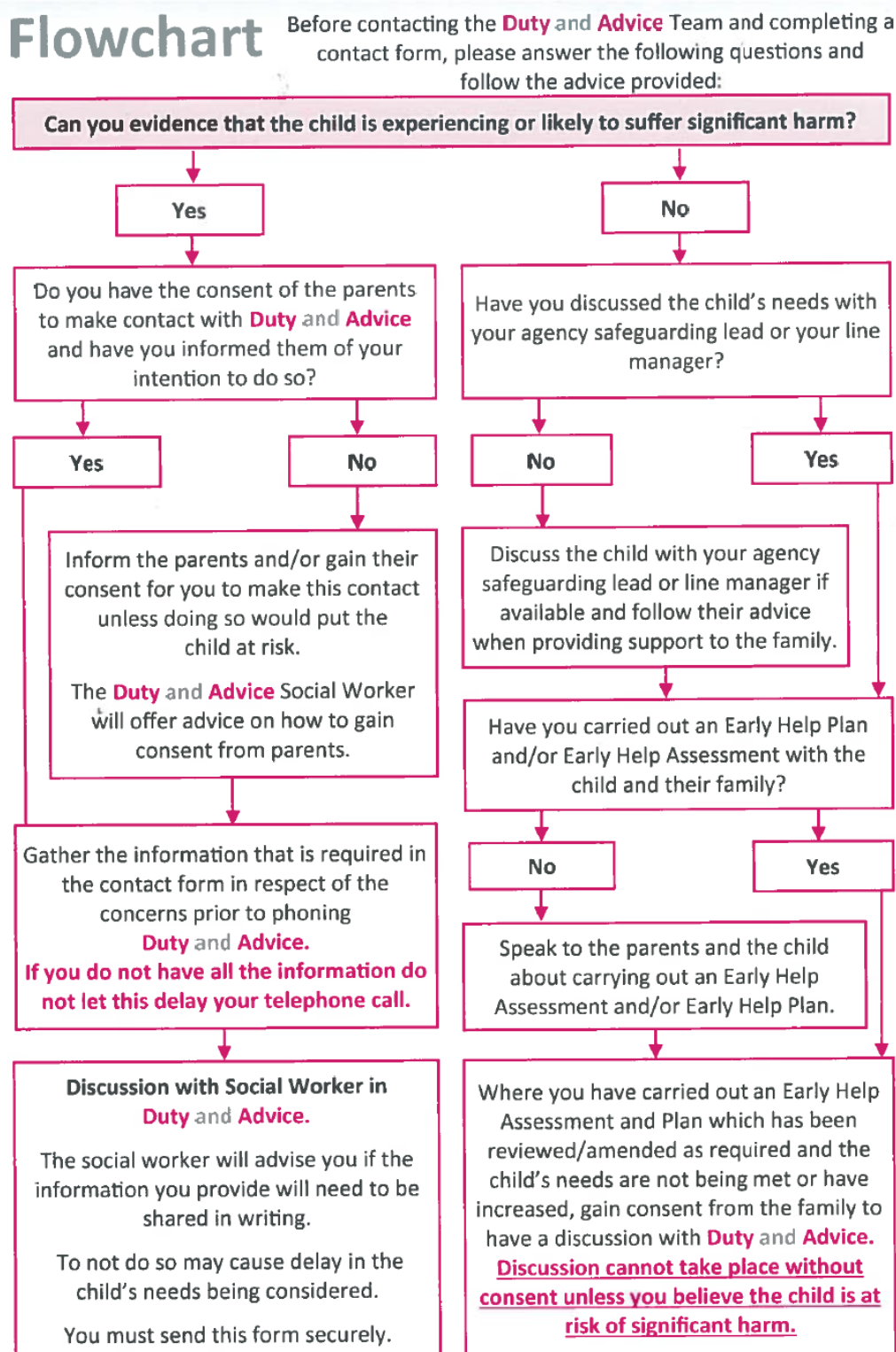
## The Principal

The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the College and via the College website
- Ensuring that the Designated Safeguarding Lead has appropriate time, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

**Fig 1 Summary of College Procedure to Follow Where There Are Concerns about a Student**

**All staff must report any concerns about a student to the named College DSL on Page 3 of this document in the first instance**



## 6. Confidentiality

- Confidentiality is an issue that needs to be understood by all those working with students particularly in the context of safeguarding
- Greenhead College recognises that the only purpose of confidentiality in this respect is to benefit the student. Staff, volunteers and visitors to College should never promise a student that they will not tell anyone about an allegation or disclosure and must pass any cause for concerns immediately to a Designated Safeguarding Lead
- Confidentiality is addressed throughout this policy with respect to record-keeping (Section 13), dealing with disclosure (Appendix 3, allegations of abuse against staff (Section 12), information sharing and working with parents (Section 6).

### Record Keeping, Information sharing and GDPR

- Timely information sharing is essential for effective safeguarding. Greenhead College will share safeguarding information as appropriate in keeping with the principles outlined in the government guidance document, Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE 2018). This guidance has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to students and young people and promotes their well-being.
- All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded electronically. Information will be kept confidential and stored securely.
- Records will include:
  1. A clear comprehensive summary of the concern
  2. Details of how the concern was followed up and resolved
  3. A note of any action taken, decisions reached and the outcome
- The storing and processing of personal data is governed by the General Data Protection Regulations 2017 (GDPR) and Data Protection Act 2018. Greenhead College will give clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply
- Staff may have access to special category personal data about pupils and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the student. Records should only be shared with those who have a legitimate professional need to see them.

### Working with parents and other agencies to protect children

Parents/carers should be aware that our College will take any reasonable action to safeguard the welfare of its students. In cases where the College has reason to be concerned that a student may be suffering significant harm, ill treatment or neglect or other forms of harm, staff have no alternative but to follow the Kirklees Safeguarding Children's Partnership procedures and contact the duty and advice team to discuss their concerns

In keeping with Keeping Children Safe in Education (KCSiE) we will endeavour wherever possible to obtain at least two emergency contacts for every child in the College in case of emergencies, and in case there are welfare concerns at the home

In general, we will discuss concerns with parents/carers before approaching other agencies and will seek to inform parents/carers and receive their consent when making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the designated

safeguarding lead. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the pupil

Parents/carers are informed about our safeguarding policy on the College website ([www.greenhead.ac.uk/policies/63.html](http://www.greenhead.ac.uk/policies/63.html)). Safeguarding, child protection and Prevent posters are displayed in College reception and throughout the College.

### **Multi-agency work**

We will co-operate with Kirklees Safeguarding Children Partnership in accordance with the requirements of the Children Act and allow access to pupil and child protection records for them to conduct Section 17 or Section 47 assessments.

In the best interests of our students, we will work with all relevant professionals and agencies as required to safeguarding children and promote their welfare.

## **7. Our Role in the Prevention of Abuse**

- The College plays a crucial role in preventative education. Preventative education is most effective in the context of a whole College approach that prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment, discrimination and prejudice linked to fundamental values.
- We will identify and provide opportunities for students to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.

### **The curriculum**

1. This College understands the importance of delivering an effective safeguarding curriculum which includes:
2. Healthy and respectful relationships.
3. Boundaries and consent.
4. Stereotyping, prejudice, and equality.
5. Wellbeing and resilience.
6. How to recognise an abusive relationship, including coercive and controlling behaviour.
7. The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support.
8. What constitutes sexual harassment and sexual violence and why these are always unacceptable.

Relevant issues will be addressed through the tutorial programme, including self-esteem, emotional literacy, assertiveness, power, relationships education, relationship and sex education, health education, online safety, online bullying, sexting, child sexual exploitation (CSE), child criminal exploitation (CCE), gangs, youth generated images, female genital mutilation (FGM), preventing radicalisation, peer on peer abuse and anti- bullying.

## Online safety

This College is committed to meeting the requirement to keep students safe when using technology. Our named designated safeguarding lead on Page 3 of this document takes responsibility for ensuring that this College's filtering and monitoring systems remain effective by overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

The system/process is checked and reviewed at least annually to ensure this College meets the DFE guidance 'Meeting digital and technology standards for schools and colleges'. We believe the whole College community can benefit from the opportunities provided by the internet and other technologies used in everyday life. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

1. **Content:** being exposed to illegal, inappropriate, or harmful content; for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-semitism, radicalisation and extremism.
2. **Contact:** being subjected to harmful online interaction with other users; for example, child to child pressure, commercial advertising and adults posing as children or young adults to groom or exploit them for sexual, criminal, financial, or other purposes.
3. **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images) and online bullying; and
4. **Commerce:** risks such as online gambling, inappropriate advertising, phishing, and/or financial scams.

Our College's expectations for responsible and appropriate conduct are set out in the College's online safety policy which we expect all staff, visitors and pupils to follow.

[Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges)

## Other areas of work

All our policies that address issues of power and potential harm, e.g. Equal Opportunities and the College re-engagement policy will be linked to ensure a whole College approach

Our Safeguarding and Child Protection policy cannot be separated from the general ethos of the College which ensures that children are treated with respect and dignity, feel safe, and are listened to

Safeguarding incidents and/or behaviours can be associated with factors outside College and can occur between students outside the school or College. All staff, but especially the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will consider the context within which such incidents and behaviours occur. This is known as Contextual Safeguarding, which simply means assessments of students should consider whether wider environmental factors are present in a student's life that are a threat to their safety and welfare.

## 8. Our Role in Supporting Students

- We will offer appropriate support to individual students who have experienced abuse or who have abused others. In cases where students have experienced abuse/abused others, the Designated Safeguarding Lead should ensure that appropriate support is offered. An individual risk assessment will be devised, implemented and reviewed regularly should the pupil (victim, perpetrator, or other student affected) require additional pastoral support/intervention.
- Our staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, cultural expectations and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. This school will determine how best to build trusted relationships with children and young people which facilitate communication.

### Early Support

If we identify additional unmet needs for a student that does not require intervention by social workers, then in the first instance it may be beneficial to speak to the **casework consultant linked to our community hub**. They can advise us whether family support may be required, this may help us to understand what support we can offer if we complete an Early Support Assessment (ESA). The Early Support Assessment should be a tool in its own right and not a referral mechanism.

For students whose needs and circumstances make them more vulnerable, a coordinated multi-disciplinary approach is usually best, based on an **Early Support Assessment**, with a Lead Practitioner to work closely with the student and family to ensure they receive the right support

### When we complete an Early Support Assessment

- The information required to evidence that more targeted or statutory services are needed will be better informed by a good quality assessment having been carried out
- If it is not clear who is best placed to provide the support an early support assessment (ESA) will be requested prior to accepting a referral
- If it is clear that additional support is required from the Family Support Service, then a referral will be accepted without an early support assessment (ESA) in order to prevent delay in offering support
- Monitoring of referrals made without assessments will be routinely reported to the Kirklees Safeguarding Children Partnership in order to promote improvement in assessment practice within all partner agencies
- If the referral is relating to a family where there is an existing team around the family meeting (TAF) an early support assessment (ESA) should have already been completed and therefore should be included with the referral

## Students with additional needs

- Greenhead College recognises that while all students have a right to be safe, some students *may* be more vulnerable to abuse e.g. those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents
- When we are considering excluding, either fixed term or permanently, a vulnerable student or a student who is either subject to a S47 Child Protection plan or there have previously been child protection concerns, we will undertake an informed (multi-agency where other professionals are involved) assessment prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to permanently exclude, the assessment must be completed prior to convening a meeting of the Governing body

## Students in Specific Circumstances

We recognise that all children can be at risk of abuse however we acknowledge that some groups are more vulnerable, this can include:

- the experience of abuse within their family.
- young people in care.
- children who go missing.
- children with additional needs (SEN and/or disabilities).
- children who identify as LGBTQ+ and/or have other protected characteristics under the Equalities Act 2010.
- children living with domestic violence or drug/alcohol abusing parents.

This College follows the Kirklees Safeguarding Children Partnership (<https://www.kirkleessafeguardingchildren.co.uk/>) online multi-agency procedures and will, where necessary, have due regard to the government guidance for children in specific circumstances as outlined in Part 1 and Annex B of Keeping Children Safe in Education (KCSiE).

## Female Genital Mutilation (FGM) the Mandatory Reporting Duty

- The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs"
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'
- **Any teacher** who discovers that an act of FGM appears to have been carried out on a **student under 18** will immediately (in consultation with the Designated Safeguarding Lead) report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it
- The duty above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff will not examine students.
- **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **student under 18** will speak to the Designated Safeguarding Lead and follow our local safeguarding procedures
- **Any member of staff** who suspects a student is *at risk* of FGM or discovers that a **student aged 18 or over** appears to have been a victim of FGM will speak to the DSL and follow our local safeguarding children's partnership procedures

## **Honour-based abuse (including forced marriage)**

The College recognises that so-called 'honour-based' violence (HBV) encompasses incidents of crimes which have been committed to protect or defend the honour of the family and/or the community. Abuse committed in this context often involves a wider network of family or community pressure and can involve multiple perpetrators. If staff in our College have a concern regarding a student that might be at risk of HBV or who has suffered from HBV they will immediately speak to the Designated Safeguarding Lead who will follow the College's safeguarding procedures. For every crime committed there are also numerous incidents of bullying, emotional and psychological abuse. Some victims have very restricted movements and are under constant supervision having little contact with the outside world.

Crimes committed may include:

- False imprisonment or kidnap
- Domestic Servitude
- ABH or GBH
- Threats to kill
- Harassment and stalking
- Sexual assault
- Rape
- Female genital mutilation
- Forced to commit suicide
- Forced Marriage (since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages)
- Murder

Further information and resources can be found via the links below:

<https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/different-types-of-abuse/honour-based-violence/>

## **Preventing Radicalisation**

Students may be susceptible to extremist ideology and radicalisation.

Similar to protecting students from other forms of harms and abuse, protecting students from this risk is part of the College's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate



the public and is made for the purpose of advancing a political, religious or ideological cause.

- For further information on this subject please refer to Page 149 of Keeping Children Safe in Education (2023).

### Responding to concerns about radicalisation

- If staff are concerned about a change in the behaviour of an individual or see something that concerns them (this could be a colleague too) they will follow the NOTICE, CHECK, SHARE principles and seek advice appropriately with the Designated Safeguarding Lead who will contact The Prevent Hub – 01924 483747 or [prevent@kirklees.gov.uk](mailto:prevent@kirklees.gov.uk) for further advice (Appendix 4)
- We will assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting students in the area and a specific understanding of how to identify individual students who may be at risk of radicalisation and what to do to support them. The Prevent Hub will advise us and identify local referral pathways
- Effective early support relies on all our staff to be vigilant and aware of the nature of the risk for students and what support may be available. Our College will ensure that as far as possible all front-line staff will undertake Prevent awareness training (e.g. Workshop to Raise Awareness of Prevent [WRAP]) which will share information on the National and Local (Kirklees) context, Extremist signs and symbols, propaganda and upskill staff in identifying and responding to Prevent concerns in line with the NOTICE, CHECK, SHARE principles [Introducing the notice, check, share procedure | Prevent duty training \(support-people-vulnerable-to-radicalisation.service.gov.uk\)](#)
- For more information about Prevent in Kirklees, including referral forms and project examples please visit the Kirklees Prevent website [www.kirklees.gov.uk/prevent](http://www.kirklees.gov.uk/prevent) or contact the hub via 01924 483747 or via email [prevent@kirklees.gov.uk](mailto:prevent@kirklees.gov.uk)

### Child-on-child abuse: Sexual violence and sexual harassment between children in schools and colleges

- We recognise that students can abuse other students and that child-on-child abuse can manifest in many ways, including physical abuse, prejudice-based and discriminatory bullying, on-line bullying, youth produced imagery (sexting), abuse in intimate personal relationships between peers, criminal and sexual exploitation, upskirting, initiation and inappropriate harmful sexualised behaviours, and that it could happen here. It is very clear that this abuse should always be treated seriously, and never just as banter, having a laugh or part of growing up. The College has a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated in this College and will be challenged. The College recognises that, even if there are no reports in our College, it does not mean it is not happening therefore College will promote an ongoing culture of vigilance to create a safe for children. **Any concerns around child-on-child abuse must be reported and recorded in line with the child protection procedures outlined in this policy and reported to the Designated Safeguarding Lead or Deputy as soon as possible.** It should be noted upskirting became a criminal offence in April 2019 and any such incidents, in line with this policy, should be treated as such. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. The Designated Safeguarding Lead is responsible for responding to such concerns in keeping with Kirklees Safeguarding Children

Partnership protocols. The Designated Safeguarding Lead is responsible for providing support to any victims, and the perpetrators

- Where students have exhibited inappropriate/harmful sexualised behaviour and/ or exhibited inappropriate harmful sexualised behaviours towards others, the **Brook Traffic Light assessment tool** will be used, and contact made with Duty and Advice, police, or early support if appropriate. College may choose to manage the incident or concern internally if appropriate depending on the nature and the students(s) involved through the behaviour policy and pastoral support. In all cases the decisions and reasons for decisions will be recorded
- College will ensure that **all** victims are reassured that they will be taken seriously regardless of how long it has taken them to come forward and that they will be supported and kept safe. All staff will be trained to manage reports of harmful Sexual Behaviour

In the event of a disclosure or report, College will:

- Listen carefully, reflecting back using the student's language
- Reassure the student that this will be taken seriously
- Ask open-ended questions
- Not promise confidentiality
- Inform the Designated Lead or Deputy as soon as practically possible if either the DSL or DDSL is not involved in the initial report
- A written record of the facts will be made
- College will consider whether electronic devices will need to be confiscated at this point
- The College will consider the wishes of the victim and how they would like to proceed, giving the victim as much control as possible in line with College safeguarding arrangements

The College will ensure that the needs of students who abuse others will be considered separately from the needs of their victims and give immediate consideration as to how best to support and protect the victim and the alleged perpetrator(s). A co-ordinated multi-agency approach will take place through a risk assessment management plan (RAMP) to respond to their needs which will include parent/carers, youth justice, police (where appropriate), children's social work service, and health which will be kept under review.

## **Mental Health**

Greenhead College will ensure that we have clear systems and processes in place for identifying students in need of extra mental health support, this will include working with external agencies. All staff should be aware that mental health problems can in some cases be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.

Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence, and adulthood. Greenhead College is aware of how these student's experiences, can impact their mental health, behaviour, education and progress at College.

If staff have mental health concerns about a student that is also a safeguarding concern immediate action will be taken and the concern will be reported to a member of the Safeguarding team.

## Additional guidance

[Mental health and behaviour in schools - GOV.UK](#)

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation: (CCE):

Both child sexual exploitation and criminal exploitation are forms of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantages (such as increased status) of the perpetrator or facilitator in exchange for something the victim needs or wants and/or will be for the financial advantage or increased status of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups of males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse

It can involve force and/or enticement-based methods of compliance and may or may not be accompanied by violence or threats of violence. 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.

Reference: Child Sexual Exploitation. *Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation* (<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>) where child sexual exploitation, or the risk of it, is suspected, frontline practitioners should pass the information onto the designated member of staff for child protection

The Designated Safeguarding Lead will assess the information and decide how to best proceed. This may involve seeking advice from partner organisations and parents.

If the student already has an allocated social worker, the Designated Safeguarding Lead will contact them (or their team manager) to discuss any concerns about sexual exploitation

A copy of the CSE checklist tool for partners can be obtained from the KSCP Website: [Child Exploitation - KSCP \(kirkleessafeguardingchildren.co.uk\)](https://www.kirkleessafeguardingchildren.co.uk)

We will ensure that the College will work in partnership with parents/carers and other agencies as appropriate. This includes facilitating return to home interviews as requested

Indicators to look out for are:

- Appear with unexplained gifts, money, or new possessions
- Associate with other children involved in exploitation
- Suffer from changes in emotional well-being
- Misuse of drugs and alcohol
- Go missing for periods of time or regularly come home late
- Regularly miss College or education or do not take part in education

Specific indicators that may be present in CSE are children who:

- Have older boyfriends
- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant

Young people who are victims of CCE include those who are:

- Trafficked within the UK with the intention of being used to commit criminal acts that benefit the trade of drugs and criminal gangs
- Coerced into the supply, transporting, and dealing of class A drugs. They may be doing this within their local area, however, they are often crossing one or more police force or local authority boundaries
- Coerced into carrying drugs, weapons, and money to assist in the trade and movement of drugs

CCE often occurs without the student's immediate recognition, and with the student believing they are in control of the situation. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength. Violence, coercion and intimidation are common, involvement of exploitive relationships being characterised in the main by the child/young person's availability of choice resulting from their social/economic and/or emotional vulnerability. The experience of girls who are criminally exploited can be very different from that of boys. The indicators may not be the same, however, we are aware that girls are at risk of criminal exploitation too. We also recognise that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

### **Serious Violence**

The College recognises when students may be at risk from/or involved with a serious violent crime by recognising the indicators such as:

1. Increased absence from College
2. A change in friendship or relationships with older individuals or groups
3. A decline in performance
4. Signs of self-harm or a significant change in wellbeing
5. Signs of assault or unexplained injuries
6. Unexplained gifts or new possessions

The College recognises the risk factors which increase the likelihood of involvement in serious violence such as:

1. Being male
2. Having been frequently absent or permanently excluded from College
3. Having experienced child maltreatment
4. Having been involved in offending, such as theft or robbery

<https://www.kirkleessafeguardingchildren.co.uk/wp-content/uploads/2020/02/Appropriate-Language-in-CSE-and-CCE.pdf>

[County lines: criminal exploitation of children and vulnerable](#)

[Preventing youth violence and gang involvement - GOV.UK](#)

### **Private Fostering**

- Private fostering is when a student under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half

blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives

- The law requires us to notify duty and advice if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the student and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity
- If we become aware of a student in a private fostering arrangement within Kirklees Council, we will notify duty and advice by calling **01484 414960**

<https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/keeping-children-safe/private-fostering/>

### **Children looked after and previously looked after Children and children with a social worker**

- All our staff recognise that students looked after, previously looked after children (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and care leavers and children with a social worker are more vulnerable than other students, often having poorer educational outcomes; therefore, ensuring their wellbeing, safety and welfare, helping them to reach their potential which includes the looked after child who is moving on. The College will also ensure that care leavers are supported with pathways including liaison with the local authority where a personal advisor will be appointed and a full working relationship is maintained with the Kirklees Virtual School head teacher in respect of all pupils at the school who are subject of 'looked after' status or have social worker. The virtual School team can be contacted on [kirklees.virtualschool@kirklees.gov.uk](mailto:kirklees.virtualschool@kirklees.gov.uk) or by calling 01484 225180.

### **Students potentially at greater risk of harm**

The College recognises that while all students have a right to be safe and well, some groups of students are potentially at greater risk of harm and more vulnerable to abuse e.g. those with a disability or special educational needs, those living with domestic abuse or drug/alcohol abusing parents.

Provisions within the Equality Act allows the College to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need.

### **Children who are lesbian, gay, bi, or trans (LGBTQ+)**

- The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In this College, we, therefore, endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff or a trusted adult.

### **Students who need a social worker (child in need and child protection plans)**

Students may need a social worker due to safeguarding or welfare needs, we recognise that students may need help due to absence, neglect, and complex family circumstances. The College will work in partnership with Kirklees Council where children have been allocated a social worker, the DSL will hold this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. Where we have children on roll who need a social worker this will inform decisions about safeguarding (responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (we

will consider the provision of pastoral support and/or academic support, alongside action by statutory services).

### **Students with Special educational needs, disabilities, or physical health issues**

Greenhead College recognises that students with (SEN) and disabilities can face additional safeguarding challenges these can include

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury related to the child's disability without further exploration
- These students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges

The College has a duty to make reasonable adjustments for disabled children therefore to address these additional challenges, we will consider extra pastoral support for children with SEND and disabilities.

## **9. Responding to Domestic Abuse**

Greenhead College understands that the cross-government definition of domestic abuse and abuse is:

- any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality
- The abuse can encompass, but is not limited to psychological, physical, sexual, financial, emotional harm
- Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour
- Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim if this College do identify children for whom domestic abuse may be a concern, they will apply the usual referral process and child protection procedures and pass this information to the Designated Safeguarding Lead (DSL). The DSL can then refer cases where relevant to Kirklees duty and advice team (DAAT). Where DV Notifications are received from DAAT, this information will be added to a pupil's chronology and child protection record to ensure that appropriate support can be provided where necessary
- Greenhead College is aware of and follow the [Kirklees Joint Agency protocol for domestic violence and abuse – \(Operation Encompass School notification\)](#) contact numbers for this must be kept updated by emailing [Education.safeguardingteam@kirklees.gov.uk](mailto:Education.safeguardingteam@kirklees.gov.uk)

## 10. Education Safeguarding

### Students who are absent from Education

- Our College recognises that students being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines and thus ensures that information is shared between the Student Services Office, Personal Tutors and the DSL using the Cedar online portal. Likewise, the College understands that a parent failing to inform the College that a student has an authorised absence could be a cause for concern and thus these parents will be contacted by the personal tutor and/or Senior tutor
- Students who are absent, abscond or go missing during the College day are vulnerable and at potential risk of abuse or neglect. Our staff members will follow the College's procedures for dealing with students who are absent/ go missing, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in future

### Suspensions and Exclusions

- When we are considering suspending or excluding, a vulnerable student or a student who is either subject to a S47 Child Protection plan or there have previously been child protection concerns or the family is subject to a court order in relation to education, we will undertake an informed (multi-agency where other professionals are involved) assessment prior to making the decision to exclude or suspend. In the event of a one-off serious incident resulting in an immediate decision to permanently exclude, the assessment must be completed before convening a meeting of the governing body.

[School suspensions and permanent exclusions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/school-suspensions-and-permanent-exclusions)

### Child Employment

- Child Employment - Properly structured and regulated work can help develop and prepare young people for a full-time working life. A young person working part-time between the age of 13 and 16 years old, must request that the employer applies to Kirklees Council for a permit. There is no charge for a work permit. Employers have the ultimate responsibility to ensure that children of compulsory school age are registered with the Local Authority and have a work permit. Parents can also face prosecution if they allow their child to work illegally. Please note that it is against the law to employ children under the age of 13. As a College, we will work in partnership with Kirklees council in relation to child employment by completing the Child Employment Referral Form as and when necessary
- Supporting information and documents can be found by clicking on the link below:

[Education Safeguarding Resources | Kirklees Business Solutions](#)



## 11. A Safer College Culture

**Governors have agreed and ratified the following policies which must be read in conjunction with this policy and be provided to all staff as part of their induction procedures:**

- Whistle Blowing reporting policies (guidance to staff and volunteers on how they can raise concerns and receive appropriate feedback on action taken when staff have concerns about any adult's behaviour)
- Safeguarding policy (including online safety)
- College student re-engagement policy
- Staff code of conduct

**Our College will comply with the guidance for safer working practice for those working with children and young people in educational settings in February 2022.**

Safe working practice ensures that Students are safe and that all staff:

- Are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Work in an open and transparent way
- Work with other colleagues where possible in situations open to question
- Discuss and/or take advice from the Senior Leadership Team over any incident which may give rise to concern
- Record any incidents or decisions made
- Apply the same professional standards regardless of gender, sexuality or disability
- Comply and are aware of the confidentiality policy
- Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them

<https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital>

### **Risk Assessments**

- Risk assessments are taken seriously and used to good effect to promote safety. Where relevant, risk assessments are carried out for individual pupils and supported by action plans identifying how potential risks would be managed.
- Individual risk assessments are also used when deciding a response to a child demonstrating potentially harmful behaviour such as sexually harmful behaviour or when identifying whether a child who may be particularly vulnerable, such as a child at risk of Exploitation.

### **Training, knowledge and skills**

- All staff members will be aware of systems within our College that support safeguarding, and these will be explained to them as part of our staff induction. This includes College's safeguarding child protection policy; the Staff code of conduct policy and the College's whistleblowing procedures



- Designated safeguarding leads will have a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care

Designated Safeguarding Leads must attend:

1. Roles & Responsibilities of the Designated Safeguarding Lead (DSL)
2. Multi-agency Working Together to Safeguard Children and Young People
3. A positive contribution to case conferences and core groups
4. They will attend DSL refresher training every two years. The DSL will undertake Prevent Awareness Training (e.g. Workshop to Raise Awareness of Prevent [WRAP]) to enable them to provide advice and support to other members of staff on protecting pupils from the risk of radicalisation
5. The College will ensure all staff including temporary and volunteers receive induction and training appropriate to their roles and responsibilities, especially staff new to the College. All staff will complete basic awareness refresher training at least every three years (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), and regular safeguarding and child protection updates via email, e-bulletins, and staff meetings as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively. Access to training can be via the Education Safeguarding Service and the Kirklees Safeguarding Children Partnership
6. The Principal will attend appropriate safeguarding training at least every three years
7. The Governing body will complete appropriate safeguarding and child protection (including online) training at induction and update every three years

### **Providing support to staff**

Designated safeguarding leads should:

- Ensure that staff are supported during the referral process
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support
- Encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, and in any measures the College may put in place to protect them
- Understand the difficulties that students may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

Training and support can be accessed through Kirklees Schools Safeguarding Officers by emailing [schoolsafeguardingofficer@kirklees.gov.uk](mailto:schoolsafeguardingofficer@kirklees.gov.uk)

Any training accessed through third party/independent providers must reflect the Kirklees Safeguarding Children Partnership protocols this training should be recorded by the College. It is the responsibility of the Principal to quality assure any training that is delivered to staff in this College.

## Safer Recruitment

- Section 175 of the Education Act 2002 requires the College to make arrangements to ensure that functions are carried out with a view to safeguarding and promoting the welfare of children.
- Regulations made under Section 157 of that Act state that we must make arrangements to safeguard and promote the welfare of students.
- The College will create a culture that safeguards and promotes the welfare of students in this College. As part of this culture, we **will** adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying or securing employment or volunteering in this regulated establishment.
- The safer recruitment of individuals to work in this College not only includes directly employed staff (or volunteers), also includes contractors, self-employed, agency, and third-party staff groups. We will set out our safeguarding and safer recruitment requirements in the contract clearly between the organisation(s) and College.
- Safer Recruitment is a vital factor in keeping children safe within the education environment. Our College, when selecting our Safer Recruitment provider, will clarify the accreditation/reaccreditation period. We will always ensure a reaccreditation period for Safeguarding training.
- We will also follow legislation governing those persons in 'regulated activity' (see below) or within 'regulated establishments' and the requirements to carry out criminal records and barred list checks.

The main legislation in this respect is contained within the:

- Children's Act 2006
- Safeguarding and Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012 ([Protection of Freedoms Act 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2012/96/contents))
- Equality Act 2010 (<https://www.legislation.gov.uk/ukpga/2010/15/contents>)
- Police Act 1997, the Police Act 1997 (Criminal Records) Regulations 2002, as amended, the Police Act 1997 (Criminal Records) No 2 Regulations 2009, as amended (<https://www.legislation.gov.uk/ukpga/1997/50/contents>)
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended
- Sexual Offences Act 2003 (<https://www.legislation.gov.uk/ukpga/2003/42/contents>)
- Keeping Children Safe in Education 2021
- Working Together to Safeguard Children 2018
- Any subsequent amendments will also apply as relevant
- Requirements relating to the appointment, discipline, capability, suspension and dismissal of staff, use of supply staff/workers, checks and information to be held on the Colleges single central register (SCR), as well as information on teacher capability to be provided in references are specified within the College Staffing (England) Regulations 2009, as amended in 2012, 2013 and 2014

## Purpose of this College's Safer Recruitment Policy

- Greenhead College will take into account the legislation highlighted above, when we employ staff or engage volunteers, contractors, self-employed, agency and third-party staff groups to work with students adopt a consistent and rigorous approach in their recruitment and selection processes with the aim of ensuring that those recruited are suitable.

The purpose of safer recruitment is ultimately to:

- **Deter.** From the beginning of the recruitment process, – this College has a rigorous recruitment process and does not tolerate any form of abuse. Wording in adverts and recruitment information will aim to deter potential abusers
- **Identify and Reject.** It will not always be possible to deter potential abusers. Therefore, careful planning for the interview and selection stage, in terms of asking the right questions, setting appropriate tasks and obtaining the right information will assist in finding out who is suitable for the role and who is not.
- **Prevent and Reject.** There are no guarantees that even the most robust safer recruitment process will prevent an inappropriate appointment. However, this does not mean it is too late to act. Ensuring that comprehensive induction processes are in place, together with appropriate policies and procedures, raising awareness through staff training and generally developing and maintaining a safe culture within the College will all help to prevent abuse or identify potential abusers
- The intention of our SR policy is to ensure that all stages of the recruitment process contain measures to deter, identify, prevent and reject unsuitable people from gaining access to pupils within the College
- Our College policy and the practical implementation of recruitment and selection processes also aim to meet all legislative requirements, any statutory or other guidance that may from time to time be issued in order to keep children safe and safer recruitment in education, as well as principles of general good practice

## Letters of Assurance

- An appropriate 'letter of assurance' will be on headed paper, personally addressed, dated, signed and provided by the relevant authorised person on behalf of the individual concerned, for example by the agency on behalf of an agency worker.
- The letter should include a statement of assurance that all of the checks we specified in our contract for services have been undertaken, the date on which they were completed, and that they are satisfactory.

Table 1

|  |  |
|--|--|
| Kirklees Council recommend the following information is requested and confirmed in writing by the following parties:   |  |
| <ul style="list-style-type: none"> <li>• Agency worker (all staff groups)</li> <li>• Contractors</li> <li>• Third Party Organisations (e.g. Kirklees Council/ NHS/ Locala/ KNH etc)</li> </ul> |  |
| <ul style="list-style-type: none"> <li>• Written confirmation all Pre employment checks (role dependent) have been satisfactorily carried out</li> </ul>                                       |  |
| <ul style="list-style-type: none"> <li>• At least one recruiter on the recruitment panel to be Safer Recruitment trained (refreshed every 3 years)</li> </ul>                                  |  |
| <ul style="list-style-type: none"> <li>• Applications forms with complete employment history</li> </ul>  |  |
| <ul style="list-style-type: none"> <li>• 2 x verified references inc. question disciplinary, substantiated allegations towards children and capability</li> </ul>                              |  |
| <ul style="list-style-type: none"> <li>• DBS (+Barred list) where appropriate</li> </ul>   |  |
| <ul style="list-style-type: none"> <li>• Prohibition from Teaching</li> </ul>  |  |
| <ul style="list-style-type: none"> <li>• S128 checks (role dependent)</li> </ul>   |  |
| <ul style="list-style-type: none"> <li>• Qualifications (role dependant)</li> </ul>  |  |
| <ul style="list-style-type: none"> <li>• Right to Work in the UK</li> </ul>  |  |
| <ul style="list-style-type: none"> <li>• Appropriate checks for overseas employees</li> </ul>  |  |
| <ul style="list-style-type: none"> <li>• Disclosure under Childcare Disqualification Regulations 2018 and Childcare Act 2006</li> </ul>  |  |
| <ul style="list-style-type: none"> <li>• References (Safer Recruitment)</li> </ul>   |  |
| <ul style="list-style-type: none"> <li>• Medical clearance</li> </ul>  |  |
| <ul style="list-style-type: none"> <li>• Any disclosed information/Risk assessments shared with School / Academy</li> </ul>  |  |
| <ul style="list-style-type: none"> <li>• Safeguarding awareness training</li> </ul>  |  |

## **12. Safeguarding concern or allegations made about a person who is in a position of trust (paid or unpaid) with children, in any setting**

**All staff should follow the College whistle blowing policy if they have concerns in relation to a colleague.**

Local Authority Designated Officer (LADO) Safeguarding concerns or allegations that may meet the LADO harm threshold.

Kirklees LADO must be contacted within 1 working day, were you have or become aware of safeguarding concerns/allegations that might indicate a person may pose a risk of harm if they continue to work in their present position, or in any capacity with children in any setting.

The LADO risk of harm threshold is set out with Working Together to Safeguard Children and Keeping Children Safe in Education mandatory guidance. This risk of harm threshold is as follows:

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

The last bullet point above includes behaviour that may have happened outside an organisation that might make an individual unsuitable to work with children, this is known as transferable risk.

An allegation can relate to an adult's behaviour outside work, and their relationships with others, if they:

- Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon;
- Have, as a parent or carer, become subject to child protection procedures;
- Are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.
- Any concerns should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect), and include concerns relating to the possession of indecent images / pseudo images of children or inappropriate relationships between members of staff and children or young people.

LADO guidance has two sections covering the two levels of safeguarding concerns and allegations:

- Safeguarding concerns / allegations that may meet the above harm threshold.
- Safeguarding concerns / allegations that do not meet the harm threshold – referred to for the purposes of LADO guidance as 'low-level concerns'.

Kirklees LADO Guidance and how to contact Kirklees LADO can be found by clicking the link here: [Local Authority Designated Officer \(LADO\) | Kirklees Council](#)

### 13. Child Protection Records

Child protection and safeguarding records will be held securely, with access being restricted to the Designated Safeguarding Lead and their deputies, Principal and in cases of Early Support, the nominated lead professional, if this is not a designated safeguarding lead/officer. For further information please see Early Support Assessments

(<http://www.kirkleessafeguardingchildren.co.uk/early-support-assessment.html>)

The following information must be kept securely with restricted access, whether paper or electronic:

- Chronology (summary of significant events and the actions and involvement of the College)
- All completed child protection causes for concern information
- Any child protection information received from the child's previous educational establishment
- Records of discussions, telephone calls and meetings with colleagues and other agencies or services
- Professional consultations
- Letters and emails sent and received relating to child protection matters
- Referral forms sent to Duty and Advice, other external agencies or education-based services
- Minutes or notes of meetings, e.g. child protection conferences, core group meetings, etc., copied to the file of each child in the family, as appropriate
- Formal plans for, or linked to, the child e.g. Child Protection Plans, Early Support risk assessments
- A copy of any support plan for the student concerned
- When a student leaves this College, we will ensure that the child protection file is transferred securely and separately from the main student file to the receiving school/educational establishment (where this is known) as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term
- When there is an existing risk management plan/assessment in place for behaviours that are deemed potentially harmful to the student or others (i.e. self-harming or harmful sexualised behaviour), this information will be shared with the destination provision prior to the student starting so that appropriate care and control measures can be put in place to mitigate the potential of any risk of further harm occurring. The Designated Safeguarding Lead will consider if it would be appropriate to share any information with the new College or school in advance of a student leaving. When a student leaves College before their official leave date, the child protection file will be transferred to the new College or school. There is no need for the College to keep written or electronic copies of the child protection records, therefore these will be deleted from electronic systems once the successful transfer has been confirmed. The exception to this rule will be in any of the following instances:
  - When a vulnerable young person is moving to a further education establishment, consideration will be given to the student's wishes and feelings about their child protection information being passed on, in order that the FE establishment can provide appropriate support. In cases when it is deemed appropriate, relevant child protection

information will be shared via the FE Safeguarding Information Sharing. The original records will be retained and archived by this College. Due consideration will be given to the sharing of any additional information requested by the receiving establishment

- When the destination educational establishment is not known (*the original records should be retained by the College*)
- When the Student has not attended the nominated educational establishment (*the original records should be retained by the College*)
- There is any on-going legal action (*the original file should be retained by the College and a copy sent*)
- Student records will be transferred in a secure manner, for example, through secure electronic file transfer or by hand. When hand-delivering student records, a list of the names of those students whose records are being transferred and the name of the educational establishment they are being transferred to will be made and a signature obtained from the receiving educational establishment as proof of receipt. When sending records through secure electronic file transfer, a delivery and read receipt of the transfer will be retained for audit purposes
- If a student moves from our College, child protection records will be forwarded onto the named Designated Safeguarding Lead at the new educational establishment, with due regard to their confidential nature. Good practice suggests that this should always be done with a face-to-face handover between Designated Staff or a verbal conversation is had over the telephone if a face-to-face handover is not possible. A signed receipt of file transfer or an electronic delivery and must be obtained for audit purposes by the delivering school
- When sending by post, student's records will be sent "Special Delivery". A note of the special delivery number should also be made to enable the records to be tracked and traced via Royal Mail
- For audit purposes a note of all student records transferred or received will be kept in either paper or electronic format. This will include the students' name, date of birth, where and to whom the records have been sent, and the date sent and/or received. A copy of the child protection chronology will also be retained for audit purposes and kept securely
- If a student is permanently excluded and moves to an alternative or specialist provision, child protection records will be forwarded onto the relevant organisation in accordance with the 'The Education (Pupil Information – England) Regulations 2005, following the above procedure for delivery of the records
- When a Designated Safeguarding Lead member of staff resigns their post or no longer has child protection responsibility, there will be a full face to face handover/exchange of information with the new post holder
- In exceptional circumstances when a face-to-face handover is unfeasible, it is the responsibility of the Principal to ensure that the new post holder is fully conversant with all procedures and case files
- All Designated Safeguarding Leads receiving current (live) files or closed files will keep all contents enclosed and not remove any material
- All receipts confirming file transfer will be kept in accordance with the recommended school retention periods. For further information refer to the archiving section

## **Archiving**

The College is responsible for retaining any child protection records they may hold. The recommended retention periods are 35 years from closure when there has been a referral to Duty and Advice. If no referral has been made to Duty and Advice the child protection record should be retained until the students 25th birthday, after which point the file will be destroyed confidentially or deleted from the Colleges electronic system. The decision of how and where to store child protection files must be made by our College via our governing body. Due to sensitivity of the information, the records should continue to be held in a secure area with limited access e.g., Designated Safeguarding Lead or Principal. The DSL is responsible for ensuring that all child protection files are archived in accordance with the timescales referenced above. The Designated Safeguarding Lead is responsible for ensuring that the appropriate timeframes for archiving and destroying child protection records referenced above are set on electronic systems accordingly for each student.

## **Student and parent access to child protection files**

Under Data Protection legislation (General Data Protection Regulation & Data Protection Act 2018) a student or their nominated representative have several legal rights in respect of information relating to them. These rights include the right to access and the right to rectification of inaccurate data. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner

Any student who has a child protection file has a right to request access to it. However, neither the student nor the parent has an automatic right to see all the information held in child protection records. Information can be withheld if disclosure:

- Could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the student or another person
- Could reveal that the student or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the student
- Is likely to prejudice an on-going criminal investigation
- Also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority
- It is best practice to make reports available to the student or their parents unless the exceptions described above apply. If an application is made to see the whole record, advice can be sought from the Local Authority
- The establishment's report to the child protection conference should be shared with the student, and parent at least two days before the conference.

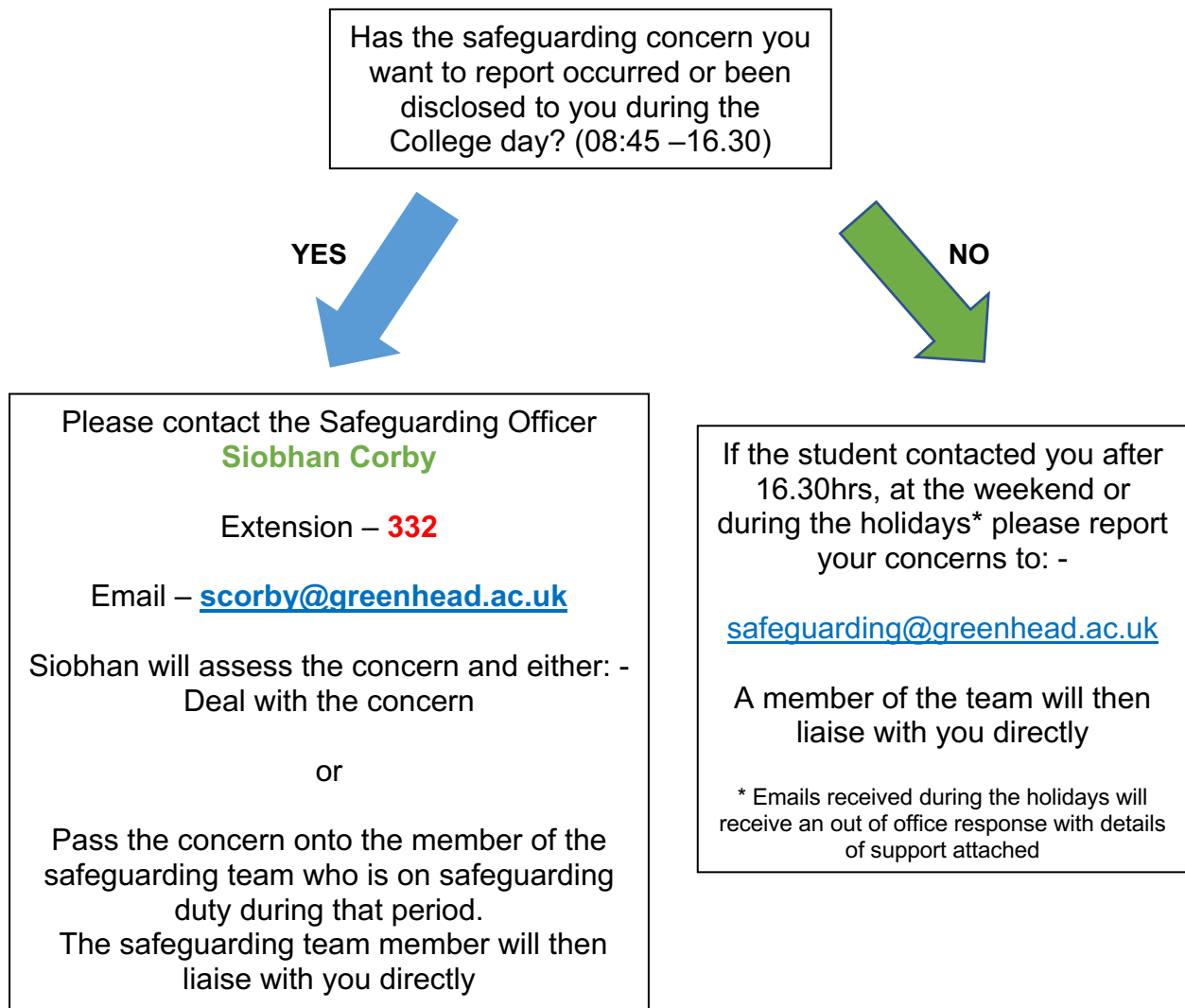
## **Safe destruction of the student record**

Where records have been identified for destruction, they will be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction should be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of Data Protection legislation, or they will contain information which is confidential to our College or the Local Authority. Information should be shredded (or deleted as appropriate) prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the College should maintain a list of records which have been destroyed and who authorised their destruction. This can be kept securely in either paper or an electronic format.



## Appendix 1 - Staff procedure for reporting safeguarding concerns

If you have any student safeguarding concerns to report please use the flow chart below to determine how it should be reported.



### Please note: -

- Non-urgent concerns can be recorded by all staff on CPOMS
- **You should never wait until the next day to report the concern**
- In Siobhan's absence please contact main College reception

## Appendix 2 - Definitions and indicators of abuse

Reference: Working Together to Safeguard Children (DfE 2018). See also Keeping Children Safe in Education Part one and Annex B.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1080047/KCSIE\\_2022\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf)

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Kirklees Safeguarding Children's Partnership (KSCP) has developed in collaboration with a wide range of partners, a toolkit with the aim of supporting anyone working with children, young people, parents and families to identify, assess and reduce child neglect.

<https://www.kirkleessafeguardingchildren.co.uk/wp-content/uploads/2020/03/6.-Neglect-Practitioners-Toolkit.pdf>

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Examples which may indicate neglect (not designed to be used as a checklist)

- Hunger
- Tiredness or listlessness
- Child dirty or unkempt
- Poorly or inappropriately clad for the weather
- Poor College attendance or often late for College
- Poor concentration
- Affection or attention seeking behaviour
- Untreated illnesses/injuries
- Pallid complexion
- Stealing or scavenging compulsively
- Failure to achieve developmental milestones, for example growth, weight

- Failure to develop intellectually or socially
- Neurotic behaviour

**Physical abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child

Examples which may indicate physical abuse (not designed to be used as a checklist):

- Patterns of bruising; inconsistent account of how bruising or injuries occurred
- Finger, hand or nail marks, black eyes
- Bite marks
- Round burn marks, burns and scalds
- Lacerations
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for sports activities
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

**Sexual abuse:** Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Examples which may indicate sexual abuse (not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate

- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example Anorexia Nervosa and Bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant
- Regressive behaviour, enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for sports activities or swimming
- Bruises, scratches in genital area

**Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child in participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment

Examples which may indicate emotional abuse (not designed to be used as a checklist):

- Over-reaction to mistakes, continual self-deprecation
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away/going missing
- Compulsive stealing
- Masturbation, appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

N.B: Some situations where children stop communication suddenly (known as “traumatic mutism”) may indicate maltreatment.

**Research and experience indicate that the following responses from parents / carers may suggest a cause for concern:**

- An unexpected delay in seeking treatment that is obviously needed
- An unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents / carers request removal of the child from home
- Violence between adults in the household

### **Children with Special Educational Needs and Disabilities**

When working with children with disabilities, College staff will to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances
- Invasive procedures

## **Appendix 3 - Dealing with a disclosure of abuse**

When a student tells me about abuse s/he has suffered, what must I remember?

- Stay calm
- Do not transmit shock, anger or embarrassment
- Reassure the student. Tell her/him you are pleased that s/he is speaking to you
- Never enter into a pact of secrecy with the student. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this state who this will be and why
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed
- Tell the student that it is not her/his fault
- Encourage the student to talk but do not ask "leading questions" or press for information
- Listen and remember
- Check that you have understood correctly what the student is trying to tell you
- Praise the student for telling you. Communicate that s/he has a right to be safe and protected
- Do not tell the student that what s/he experienced is dirty, naughty or bad
- It is inappropriate to make any comments about the alleged offender
- Be aware that the student may retract what s/he has told you. It is essential to record all you have heard
- At the end of the conversation, tell the student again who you are going to tell and why that person or those people need to know
- As soon as you can afterwards, make a detailed record of the conversation using the student's own language. Include any questions you may have asked. Do not add any opinions or interpretations

NB It is not the College staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk

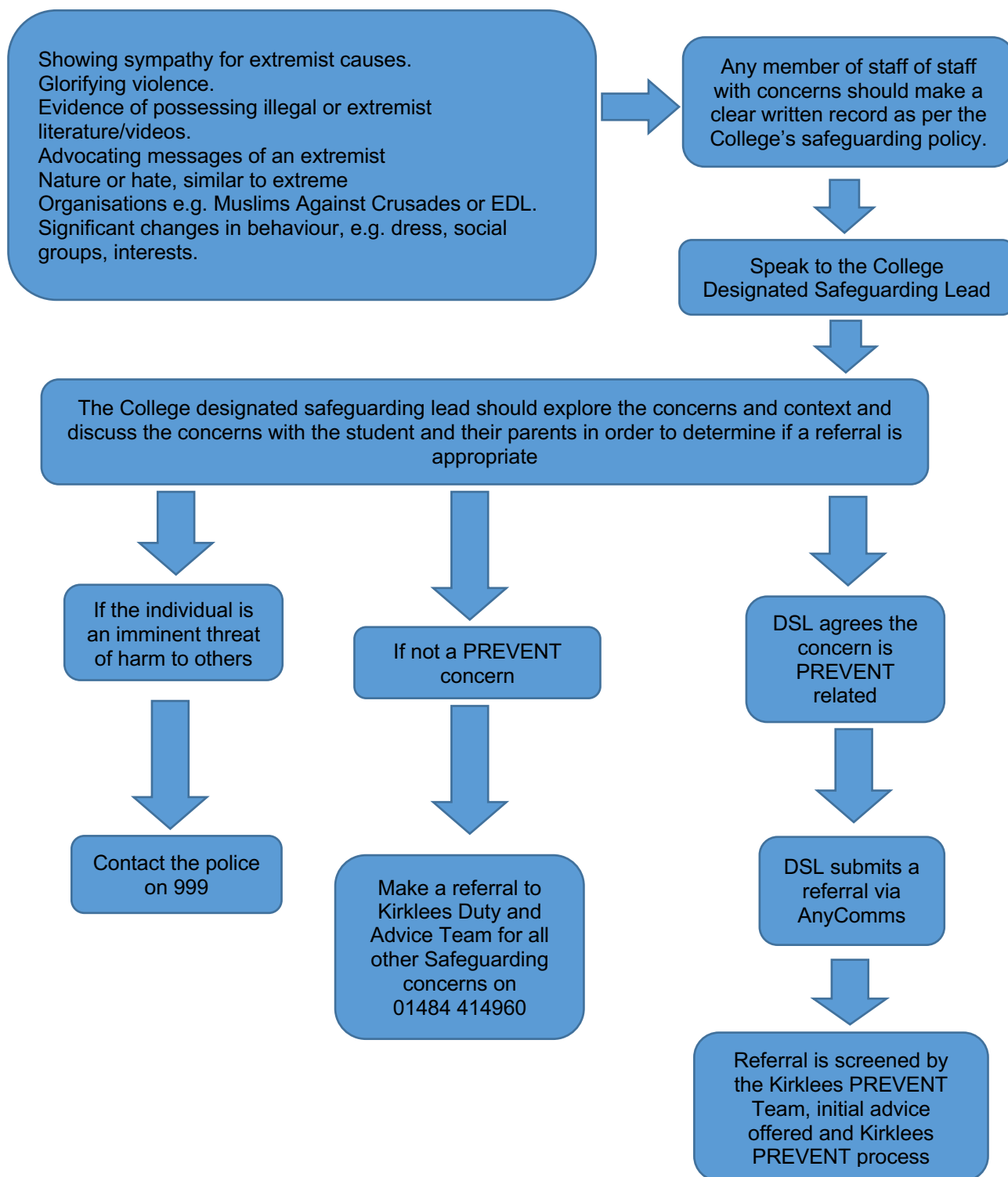
### **Immediately afterwards**

All disclosures of abuse will be responded to in keeping with the professional roles and responsibilities outlined in Fig 1 summary of College procedure to follow where there are concerns about a student.

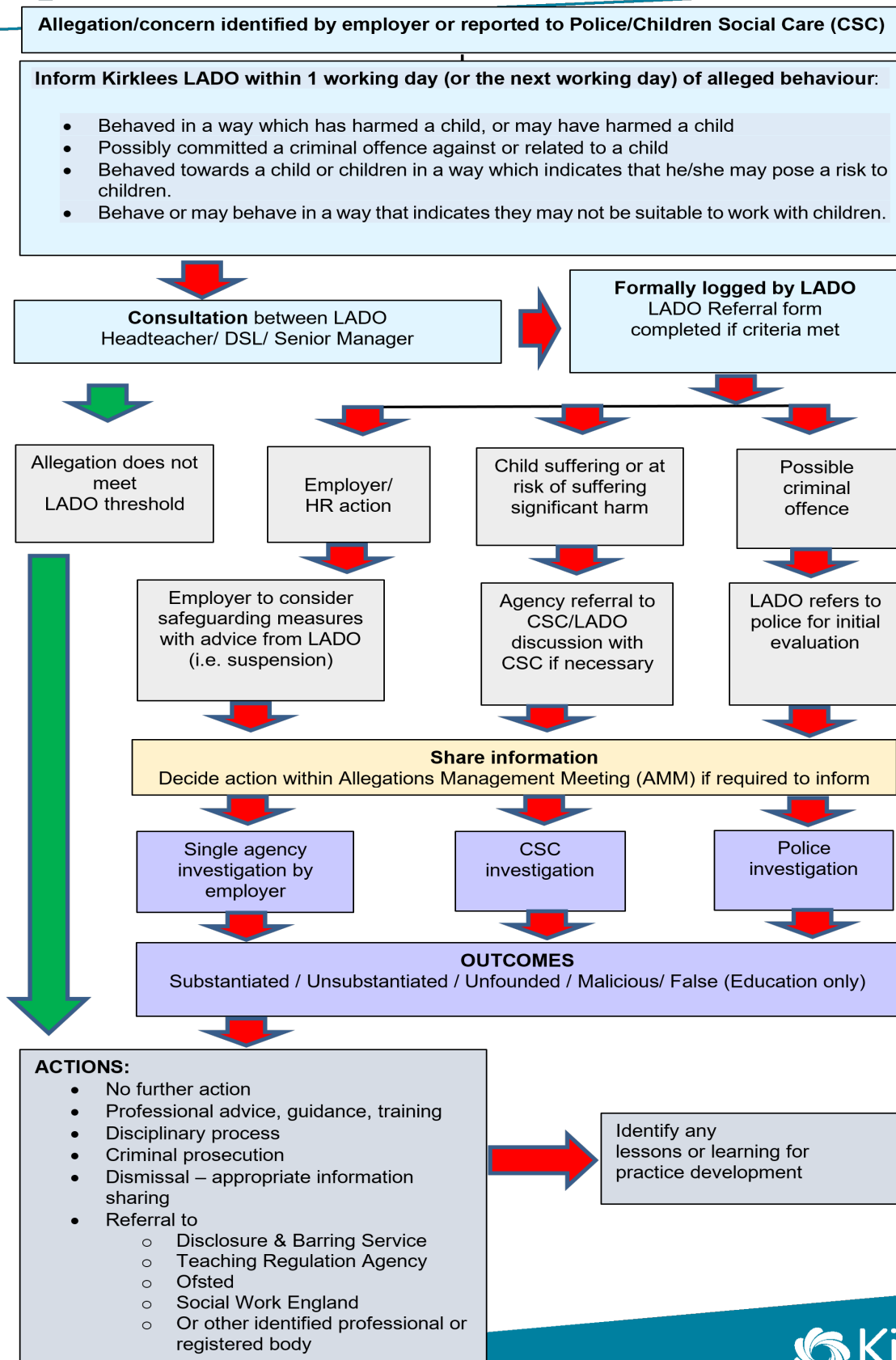
## Appendix 4 - Radicalisation Response Checklist

Summary of in-College procedures to follow where there are potential radicalisation concerns about a child/member of staff

Further information and relevant guidance documents referred to, are available electronically from For more information about Prevent in Kirklees, including referral forms and project examples please visit the Kirklees Prevent website [www.kirklees.gov.uk/prevent](http://www.kirklees.gov.uk/prevent) or contact the hub via 01924 483747 Anycomms "Prevent Referral"



## Appendix 5 - Kirklees LADO Flow Chart





This policy had been produced in consultation with members of the policy task group:

- Kirklees Education Safeguarding Service
- Kirklees Safeguarding Children's Partnership
- Children & Families - Early Support
- Children & Families - Early Learning
- Kirklees Duty & Advice
- Woodley School & College
- Newsome High School
- Howard Park Community School
- BBG Academy (The Rodillian Multi Academy Trust)
- Joseph Norton Academy
- Ashbrow School

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|--|--|
| <i>Author:</i>                           | <i>Assistant Principal and DSL – (SSW) (UAN)</i> |
| <i>Date drafted:</i>                     | <i>September 2023</i>                            |
| <i>Date accepted by the Corporation:</i> | <i>December 2023</i>                             |
| <i>Date of next review:</i>              | <i>December 2024</i>                             |

***“This policy has been impact assessed to ensure it complies with all aspects of Equality and Diversity. Members are reassured that this policy is compliant with current equality legislation”.***