

# Safeguarding Policy (Including Child Protection)

England

September 2024

## Document Control

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## Associated Documents


Policy
Global Staff Code of Conduct Safer Recruitment Policy H&S Policy and Associate Procedures Use of Technology Policy Whistleblowing Policy Attendance Policy External Speakers (including Freedom of Speech) Policy Data Protection Policy Criminal Convictions Policy

Fitness to Study
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#### Legislation and Government Guidance

Keeping Children Safe in Education, Sept 2024  
Sexual violence and sexual harassment between children in schools and colleges  
Working together to safeguard children, 2018  
Guide to the General Data Protection Regulation, 2018  
DfE Meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards  
Searching-screening-and-confiscation 2022  
Use of reasonable force in schools, July 2013  
Multi-agency-statutory-guidance-on-female-genital-mutilation 2020  
Prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales  
Counter Terrorism and Security Act, 2015  
Equality Act, 2010  
Forced Marriage

#### Approved

Proprietor	Signature and date
Sir Keith Burnett Chair of Study Group Ltd	 19 <sup>th</sup> August 2024

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## 1. Introduction

This policy and its associated procedures describe the safeguarding principles in place to support the welfare of students across the network of Centres within England. This includes all students, regardless of age. As Study Group also has students who are under the age of 18, this policy also includes the Child Protection requirements attached to this age group, in line with the *Keeping Children Safe in Education, Sept 2024* guidance and *Working Together to Safeguard Children, July 2018*.

This policy applies to all permanent, contracted, agency and volunteer staff working at, or visiting, any Centre, including those who work virtually or do not have cause to come into direct or regular contact with students in the course of carrying out their daily duties.

## 2. Purpose and Aims

It is recognised that students are a long way from home, experiencing a new culture and environment and that this may give rise to specific needs. As such, the International Study Centres aim to be communities where students of all ages are protected from harm and have the right to access their education in a safe and secure environment.

The safeguarding policy aims to ensure that:

- All students are safe;
- All staff and students can recognise welfare issues and signs of abuse;
- All staff act according to the best interests of the students;
- All welfare and child protection concerns are escalated to an appropriate member of staff in a timely manner;
- Safeguarding is integrated into the leadership and management of the Centre.

## 3. Safeguarding Principles

The following principles underpin all safeguarding practice:

- Safeguarding is everyone's responsibility;
- All staff understand that abuse in any form can happen within and outside the Centre;
- There is a Designated Safeguarding Lead (DSL) who has overall responsibility for safeguarding;
- The DSL acts on all safeguarding or child protection concerns in line with current legislation;
- The DSL acts as the Local Prevent Lead;
- All staff and students are vigilant of possible safeguarding issues and risks of harm, including online safety;
- All staff and students have effective and various means to raise concerns;
- All students know who to turn to for help, advice or support, can access services confidentially, quickly and easily and can gain access to 24-hour support through a variety of means, including: emergency services, the 24/7 Student Assistance Programme provided by Health Assured in partnership with Endsleigh Insurance, other helplines;

- All reasonable steps are taken to ensure the whereabouts of any student who is aged under 18 years or is considered an adult at risk as defined in the *Care Act 2014*;
- All staff are aware of the importance of early help and how to access it;
- All Centre buildings (including accommodation) are safe places for students to learn and live;
- All students feel safe and secure and protected from harm;
- Staff have access to and understand the Safeguarding Policy and Procedures;
- The Centre Director has overall accountability for the safeguarding and welfare of students within the Centre;
- All relevant Centre staff are made aware of the learning differences, health (including mental health) and disabilities of individual students;
- There is regular monitoring and reporting of welfare and safeguarding issues so that trends are identified and acted upon.

## 4. Safeguarding Roles and Responsibilities

All staff members including permanent, temporary, agency, contractors and volunteers are responsible for safeguarding.

All staff members are prohibited from having intimate personal relationships with any student of the Centre. The prohibition applies to sexual activity and romantic or emotional intimacy.

### 4.1. Designated Safeguarding Lead (DSL)

The DSL is trained in higher level safeguarding and Prevent referrals and both are updated every 2 years. Depending on the size of the Centre, this may be a dedicated role or form part of another role. In line with the *Keeping Children Safe in Education, September 2024* guidance, the role of DSL will always be an appropriate senior member of staff from the leadership team within the Centre but not usually the Centre Director. The DSL also assumes the responsibilities of the Local Prevent Lead as required by the Prevent Duty Guidance for higher education institutions in England and Wales.

The DSL is responsible for ensuring:

- All students and staff have sufficient and appropriate means to report concerns, issues, and incidents, and that all concerns are responded to;
- Centre staff have access to and understand the Safeguarding Policy & Procedures;
- Centre staff complete appropriate safeguarding awareness and Prevent Duty training;
- Advice and support are available to staff on issues relating to safeguarding;
- Individual welfare or safeguarding risk assessments are completed and followed;
- A complete and up-to-date record of all safeguarding related issues and activities is maintained and stored securely;
- Promote positive mental health and wellbeing, ensuring students receive appropriate individual support and advice, including those with health conditions (physical, emotional and/or mental health) and/or care plans;
- Students at risk are referred to the Local Authority Children's or Adult Services (dependent on age), the police and any other external agency as appropriate;
- Safeguarding concerns relating to a member of staff who meet the threshold of harm are reported to the LA Designated Office;
- Significant safeguarding concerns are escalated within Study Group in line with the *Safeguarding Escalation Policy*;

- Working links with other agencies are established to provide welfare support and information to students;
- The Centre works in partnership with local agencies and organisations to support the requirements of the Prevent Duty;
- Prevent referrals are discussed with the Director of Compliance, UK as the Study Group Prevent Lead, and where appropriate, the Prevent Coordinator or Prevent Police (Refer to Appendix 2 and 3 for contact details);
- Receive filtering and monitoring reports, acting on any safeguarding and child protection concerns the same day;
- The Centre Director and relevant Study Group personnel are kept informed of any appropriate information on significant safeguarding or welfare issues (in line with current legislation);
- Information is shared with parents, agents or sponsors following the *Information Sharing Principles* in line with the *UK General Data Protection Regulation* (UK GDPR);
- Strong relationships with partner university agencies are maintained to provide welfare support and information to students.

Please refer to Appendix 1 for the DSL for your Centre.

#### 4.2. Deputy Designated Safeguarding Lead (DDSL)

The DDSL is trained to the same standard as the DSL and undertakes the duties of the Designated Safeguarding Lead in their temporary absence.

#### 4.3. Centre Director

Overall accountability for the safeguarding and welfare of students lies with the Centre Director. They are accountable for ensuring:

- A staff member is allocated to the DSL and DDSL roles;
- All staff are aware of which staff have been allocated the roles of the DSL and DDSL;
- The DSL and the deputy can always operate within their statutory responsibilities as defined by the *Keeping Children Safe in Education, September 2024* guidance;
- The DSL and DDSL refresh their higher level safeguarding and Prevent referral training every 2 years and update their knowledge at least annually;
- The DSL and DDSL understand their role as part of the safeguarding partners arrangements;
- All staff have seen and signed the Part 1 and Annex B of the *Keeping Children Safe in Education* guidance;
- The Centre has a comprehensive safeguarding (including Prevent Duty) risk assessment in place that is reviewed at least annually;
- All staff are recruited safely in line with the *Safer Recruitment Policy*;
- All safer recruitment checks are recorded within a Single Central Record (SCR);
- The completion of the Annual Safeguarding Review;
- The *Escalation Policy* is used to refer significant concerns;
- All staff receive safeguarding awareness training which includes online safety and their role and responsibilities in relation to filtering and monitoring systems within their initial induction period and every three years thereafter;
- All staff undertake Prevent Duty training appropriate to their roles which is refreshed via briefings and updates as appropriate;



- All staff have due regard to the need to prevent people being drawn into terrorism and apply this in a sensitive and proportionate way to maintain open free speech and academic freedom;
- A safeguarding training log is maintained and available to view on request;
- Systems are available to log welfare and safeguarding concerns and subsequent actions;
- Where services or activities on Centre premises are provided separately by another body, assurances should be sought that the provider has appropriate safeguarding and child protection policies and procedures in place and ensure that there are arrangements in place for the provider to liaise on these matters where appropriate;
- Ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises and that failure to comply with this would lead to termination of the agreement;
- Ensure that if the Centre receives an allegation relating to an incident where an individual organisation was using the Centre premises for running an activity for children, staff follow safeguarding policies and procedures and inform the designated officer.

#### 4.4. All staff

All staff must read and sign to say that they have understood *Part 1* and *Annex B* of the *Keeping Children Safe in Education 2024* guidance.

All staff members are responsible for ensuring they:

- Undertake safeguarding awareness training within their induction period and every 3 years thereafter;
- Participate in the annual safeguarding refresher training;
- Read and understand Part 1 and Annex B of Keeping Children Safe in Education;
- Undertake Prevent Duty training appropriate to their roles, refreshed every 3 years;
- Read and understand the Safeguarding Policy and the associated policies and procedures within their Centre;
- Are aware that some students such as those with health conditions (physical, emotional and mental) are at greater risk of harm than others, both online and offline;
- Are aware of who to raise concerns to about staff and students and by what means;
- Always act professionally and in line with the *Global Code of Conduct*;
- Challenge behaviour which is considered harassment, sexual misconduct whilst balancing this with a need to enable lawful freedom of speech;
- Understand their role and responsibility in meeting the digital and technical standards around filtering and monitoring systems, including, knowing what to report e.g. if they witness or suspect unsuitable material has been accessed, failure in software or abuse of the system, perceived unreasonable restrictions that affect teaching and learning, notice abbreviations or misspellings that allow access to restricted material and how to report this.

#### 4.5. Head of IT operations

The partner university provides the majority of IT services, and their policies will apply. For Centres where Study Group is responsible for provision, the following apply:

- Meet the Department for Education's Digital Technology standards;

- Purchase, install and review the effectiveness of filtering and monitoring provision at least annually;
- Block harmful and inappropriate content without unreasonably impacting teaching and learning;
- Provide a daily report to the Student Experience Team where student internet activity gets blocked so the relevant DSL can be alerted and follow up as required.

## 5. Raising Concerns

### 5.1. Enabling students to raise concerns

All students must be made aware of the importance of raising concerns relating to themselves or others and not to act as a bystander. They must also be made aware of the means available to them to raise these concerns. This should include key contacts within the Centre, information during induction and tutorial support and how to contact emergency and support services.

These reporting systems must be well promoted, easily understood and accessible to encourage students to have the confidence to disclose and know that they will be listened to and supported throughout. *Please refer to your local procedures for more information.*

### 5.2. Concerns about a student (any)

All staff members are made aware at induction of how to raise concerns about students using a variety of means i.e. via agreed electronic tracking system or verbally.

All welfare concerns must be raised in a timely manner, and no later than the end of the same working day. Staff must not be bystanders, nor assume others have reported the concern.

All safeguarding or child protection concerns must be reported, either face-to-face or via telephone, to the DSL or DDSL immediately. All referrals must be followed up in writing as per the instructions of the DSL or DDSL.

Please refer to *Appendix 1* for contact details of the DSL and DDSL(s) in your Centre.

### 5.3. Child Protection concerns

A child is any student who is under 18 years old.

In the event a child protection concern is identified, this must be referred to the DSL immediately or DDSL in their absence. The DSL will ascertain the information needed to determine whether to refer to local Children's Services and/or other external agencies as appropriate.

A full list of DSLs and contact details are available in *Appendix 1*.

### 5.4. Allegations about a member of staff (including contractor, supply and agency staff)

Allegations against any member of staff, whether employed or a former employee (including claims of historical abuse) will be managed in line with Keeping Children Safe in Education, September 2024.

If a concern is identified about the behaviour of a staff member which indicates they may have:

- harmed a child or pose a risk of harm to a child
- committed a criminal offence against a child
- behaved in a way that means they are not suitable to work with children

This must be reported immediately to the Centre Director or, in their absence, the Senior HR Business Partner. The Centre Director or designate in their absence must seek advice from the Student Experience Director (or Central Student Wellbeing Team if unavailable). The Student Experience Director in liaison with the Senior HR Business Partner will determine if the threshold of harm to involve Children's Services has been met.

Any allegation meeting the threshold of harm to involve Children's Services relating to a staff member will be referred to the LA Designated Officer within 1 working day and before an investigation has been started. Any advice or guidance offered by the LA Designated Officer must be acted upon by the DSL and Centre Director. Any internal disciplinary processes will be halted until confirmation is received by the LA Designated Officer.

The *Staff Disciplinary Policy* will be followed where the student is over the age of 18 or in the case of a student under the age of 18 where the threshold of harm is not met.

If Study Group is made aware of the behaviour of any staff member outside of work (regardless of whether a child is involved or not) and deemed a transferable risk, this may lead to disciplinary action. Transferable risks such as a domestic violence incident should be referred to the Centre Director or, in their absence, the Senior HR Business Partner who will escalate to the Safeguarding Panel and manage allegations or confirmed offences in line with *Keeping Children Safe in Education, September 2024* and *Study Group's Disciplinary Policy*.

### 5.5. Allegations about the Centre Director or Study Group senior staff

In the event of a concern about the Centre Director or any member of Study Group senior personnel is identified, this must be reported to **Elena Rodriguez-Falcon, Executive Director, Academic UK & Ireland Operations** as soon as possible.

### 5.6 Reporting allegations outside of the Centre

Anyone (staff, parents, students, and members of the public) may share their concerns directly with external agencies such as local Children's Services or the police if they have concerns that there is a risk of immediate harm, without needing parental consent.

For mandatory reporting relating to acts of Female Genital Mutilation (FGM) for teachers, please refer to *section 7.11*.

### 5.7. Whistleblowing

Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Centre safeguarding regime.

Please refer to the *Study Group Global Whistleblowing Policy* for further details.

## 6. Investigations

All allegations must be investigated in line with Study Group policy and the *Keeping Children Safe in Education, September 2024*.

Advice and guidance relating to investigations can be sought from the *Senior HR Business Partner*.

### 6.1. Supporting students during investigations

Students will be supported by a welfare officer during all investigations. This includes those that reported the concern, those about whom a concern was raised and those against whom an allegation has been made.

The decision to contact parents and/or agents will be made on a case-by-case basis dependent on the disclosure, the safeguarding risk to the student and the student's wishes. Refer to the *Information Sharing Principles*.

### 6.2. Supporting staff during investigations

Where an allegation has been made about a staff member, the Centre's primary responsibility is to ensure the safety of students, however all staff involved will be supported including the person who raised the concern, any witnesses and the person subject to the allegation.

Please contact the Senior HR Business Partner for further advice and guidance relating to supporting staff during investigations.

### 6.3. Malicious or unsubstantiated allegations

If an allegation made by a student who is under 18 is determined to be unsubstantiated or malicious, the DSL may refer the matter to the Children's Services to determine whether the student concerned needs services or may have been abused by someone else.

Allegations deemed malicious may also be addressed via the disciplinary procedures.

### 6.4. Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA)

A referral to the DBS will be made if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is the responsibility of the Senior HR Business Partner.

This is a legal duty and failure to refer when the criteria are met is a criminal offence. In the case of a member of teaching staff the matter may be referred to the TRA to consider prohibiting the individual from teaching.

Please refer to the *Study Group Safer Recruitment Policy* for more information.

## 7. Welfare Issues

All staff should be aware of the potential for welfare issues and abuse from completing safeguarding awareness training however they should also refer to <https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/> for further information.

The definitions of abuse and an *Indicators of Abuse and Neglect* are available in *Appendix 4*.

### 7.1. Bullying

The Centre has a zero-tolerance policy on bullying, including online, and as such staff and students must be vigilant. Information about bullying is included within the safeguarding awareness training for staff and within the induction for students.

Any concerns about bullying including prejudice based and discriminatory bullying must be raised in line with *Section 5*.

The student who is being bullied will be supported by staff responsible for student welfare. As bullying behaviours are also indicative of abuse, the student accused of bullying will also be supported by the welfare team and/or another appropriate member of staff.

Students will be encouraged to report any incident of bullying identified as a hate crime to the Police with the support of the DSL or a nominated person.

### 7.2. Student whereabouts and attendance

The Centre understands that unexplainable and/or persistent absences from education if not addressed and students supported could lead to them going missing and indicate a significant safeguarding concern such as child sexual exploitation, child criminal exploitation or mental health concerns. As such, the whereabouts of students is monitored and recorded, especially for those that are under 18 years old or are considered at risk for another reason. The local procedures for locating the whereabouts of a potentially missing student may include contact with the College Guardians, parents, or agents as appropriate. Please refer to the *Student Whereabouts Procedure* for further information.

Attendance is recorded for all students. Please refer to the *Attendance Policy* for further information.

### 7.3. Peer-on-Peer abuse

This includes child-on-child abuse.

The Centre understands that students can abuse other students face to face, online and with social media and that this represents a safeguarding concern. Study Group adopts a zero-tolerance approach to sexual violence, sexual harassment, bullying, intimate partner abuse and upskirting.

Staff members are advised about the types and indicators of peer-on-peer abuse within the safeguarding awareness training. Any concerns should be raised with the DSL immediately in line with *Section 5*.

Staff are advised that all reports of abuse must be taken seriously and take a “it could happen here” approach.

If an incident is identified as child-on-child-abuse (or involving an U18 student), then a referral will be made to the local children’s social care or police.

The perpetrators of peer-on-peer abuse will be subject to disciplinary action and/or reported to the police if it results in (or the threat off) sexual violence or harassment or other crimes. Both the victim and the perpetrator will be supported by the welfare team during this process.

#### 7.4. Harassment and sexual misconduct

Harassment including sexual harassment includes unwanted behaviour or conduct which has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment because of or connected to one or more of the following protected characteristics; age, disability, gender reassignment, race, religion or belief, sex and sexual orientation (S26 Equality Act 2010 and S1 the Protection from Harassment Act 1997).

In deciding whether behaviour constitutes harassment we’ll take into account perception of the reporting party, other circumstances and if it is reasonable for the behaviour to be taken as harassment.

Sexual misconduct means any unwanted or attempted unwanted conduct of a sexual nature and includes but is not limited to sexual harassment, sexual assault or rape as defined in the Sexual Offences Act 2003.

All Study Group students must be protected from harassment and sexual misconduct from other students, staff, and visitors, and as such there is zero tolerance of any form of harassment, inappropriate sexualised behaviour or sexual misconduct. This includes those instances that are face-to face or on-line. Staff members should refer to the *Global Code of Conduct* for further information.

Students should refer to the *Student Safeguarding Policy*, the *Student Behaviour Charter* and the *Student Disciplinary Policy* for further information.

Being subjected to harassment, violence and/or abuse may breach a child’s rights as set out in the *Human Rights Act*, so for any incident of harassment or sexual misconduct that involves a student who is under 18 years old, consideration will be given to reporting the incident to Children’s Services and/or the police as per the requirements of *Keeping Children Safe in Education 2024*.

In the event a student is over 18 years old the decision to call the police will depend on the student’s wishes, the severity of the incident and/or the risk to others.

We will not use non-disclosure agreements where there has been a complaint of harassment or sexual misconduct.

### 7.5. Substance misuse

This includes but is not limited to drugs (illegal and legal highs), alcohol, tobacco and vape devices.

The Centres operate a zero-tolerance policy on the use or misuse of illegal substances by any student, including the use of alcohol, tobacco and vaping products by students under 18. This applies to the Centre and all allocated accommodation.

Information is provided during the induction through the *Student Behaviour Charter*. This is supported by welfare advice and guidance both in the induction and throughout the year.

If a student is found to have used, misused or dealing any illegal substance (including medication defined as a controlled substance), this may result in disciplinary processes being initiated. Any student over 18 assisting a younger student to obtain alcohol, tobacco or vaping products will also be subject to disciplinary action. The incident may also be reported to the police.

In the event a student expresses a concern regarding drugs or alcohol, then support and advice is available via the Centre welfare staff.

### 7.6. Child Sexual Exploitation (CSE)

In the event a student is identified as possibly being a victim of CSE, this must be referred to the DSL who will refer the student to the local Children's Services.

Please refer to *Section 5* for information on how to raise concerns.

### 7.7. Child Criminal Exploitation: County Lines (CCE)

The Centre understands that students could be criminally exploited and that this may be missed because of the geography in which the criminal activity takes place. Although the *Keeping Children Safe in Education, September 2024* guidance advises action related to county lines, staff members must also be vigilant to the potential for criminal exploitation on an international level.

If a student is identified as being a potential victim of CCE, possibly as part of a drug network or a gang, a concern should be raised with the DSL who, if appropriate, will refer it to the National Referral Mechanism (NRM).

### 7.8. Domestic abuse and/or violence

The Centre condemns domestic abuse and/or violence in any form, including coercion and control and as such information is included in training for staff and in the induction for students. Any student concern related to seeing, hearing or experiencing effects of domestic abuse and/or violence must be raised with the DSL.

### 7.9. Homelessness

If a current student becomes homeless, support is available to them via the Centre welfare staff. If an U18 student, refer to local Children's Services for advice.



### 7.10. Honour-based violence or abuse

In the event a student under the age of 18 is identified as being a potential victim of honour-based abuse, this must be referred to the DSL who will refer the student to the local Children's Services.

### 7.11. Female Genital Mutilation (FGM)

Information for staff about FGM is included within the safeguarding awareness training.

The Centre is committed to ensuring that female students are safeguarded against FGM so staff who suspect that FGM has been carried out, or could potentially be carried out, must report these concerns to the DSL (or their Deputy).

If a teacher in the course of their work, is informed by a girl under 18 that an act of FGM has been carried out on her or observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary; this must be reported to the police as part of the teacher's statutory duty. The DSL must also be informed once this referral has been made.

All other staff should report concerns relating to FGM in line with *Section 5*.

### 7.12. Forced Marriage

The Centre recognises that forced marriage may or may not be as a result of violence, coercion and threats which can be physical, emotional or psychological. If a concern or suspicion is raised regarding the potential for forced marriage in relation to a student under the age of 18, the DSL along with the welfare staff will work with Children's Services to support the student. Forced marriage also applies to non-binding, unofficial 'marriages'.

All other staff should report concerns relating to forced marriage in line with *Section 5*. The Forced Marriage Unit should be contacted for advice.

### 7.13. Online safety

Use of the internet is a necessary tool for teaching and learning. Students use the internet widely both inside and outside the learning environment, and whilst provisions are made within the supply of internet and Virtual Learning Environments to protect student safety (such as internet filters) it should be reinforced to students that they are ultimately responsible for their own safety and security when using the internet.

As part of the student induction and tutorial activity throughout the year students are taught about the safe use of the internet (including the dangers associated with the dark web), the appropriate use of social media and how to safely publish content online. They are also made aware of the importance of reporting online abuse internally and externally, including for example the sharing of 'nudes'/sexual imagery.

Staff members should refer to the *Use of Technology Policy and the Global Staff Code of Conduct* for further information regarding the use of the internet whilst in an educational setting. It must be noted that the sharing of personal contact details in any form with students may result in disciplinary action. This includes sharing personal details via the VLE's or partner university websites.



Staff must not take photos of students unless they are informed, there is active written permission, or it is part of their job to do so. Likewise, any photos taken must not be used on social media unless there is written agreement from the student and permission from the Study Group *Creative Services* team.

Under no circumstances should personal devices be used to take images or video of students, and only equipment provided by Study Group must be used. Please refer to the *Global Code of Conduct* for further information.

## 8. Radicalisation and/or Extremism (Prevent Duty)

The following applies to all students regardless of age.

The Prevent Lead for Study Group is the Director of Compliance, UK.

The DSL acts as the Local Prevent Lead unless otherwise stated.

Study Group recognises that Centre staff can make a positive contribution towards protecting students from radicalisation or violent extremism. To minimise the risk of this eventuality, Study Group promotes:

- Mutual respect and tolerance of those with different cultures, faiths and beliefs;
- Respect and acceptance of the protected characteristics of others;
- Understanding of the importance of identifying and combatting discrimination;
- Global community values.

### 8.1. Concerns about students

If concerns are raised about a student who is exhibiting changes of behaviour and language that could indicate radicalisation or potentially lead to extremism, this must be reported to the DSL immediately who will raise with the Central Student Wellbeing Team before raising with the local Channel Team or referring to the police (and local Children's Services in cases where the student is under 18).

Please refer to section 5 for further information on raising concerns about students.

### 8.2. Concerns about staff

In the event a concern is raised about a staff member then this should be raised to the Centre Director or the Senior HR Business Partner in their absence. The DSL, as Local Prevent Lead, must also be informed and advice sought from the Student Experience Director. Further advice will be sought from the local Channel Team or a referral made to the police if appropriate. The Study Group Prevent Lead will be kept informed and make any necessary reports to regulatory bodies.

*Please contact the Senior HR Business Partner for further advice.*

### 8.3. Staff training

All staff members receive Prevent Duty Training during initial induction and refreshed every 3 years. This is supplemented by Safeguarding Awareness training with links to grooming, disenfranchisement and contextualized against local issues. This information and training are updated via briefings as required, and at least annually.

#### 8.4. Internet filtering and monitoring

Internet use is both filtered and monitored in line with the *Prevent Duty* as defined by the *Counter Terrorism and Security Act 2015* and to meet the *Department of Education standards*. Where Study Group provides internet access, the responsibility for filtering and monitoring sits with Study Group whereas the affiliated university is responsible for any internet that they provide. Please refer to university policies as appropriate.

Study Group uses an IT filtering and monitoring system called Cisco Umbrella. Reports are generated daily and reviewed by the Student Experience team. Concerns related to students are raised directly with the local DSL who are responsible for taking appropriate and timely action in line with this policy. Concerns related to staff are raised with the Senior HR Business Partner.

Please refer to the *Use of Technology Policy* for further information on the appropriate use of Study Group technologies and internet access.

#### 8.5. External speakers and freedom to debate

Centres must have regard to the importance of lawful free speech.

Centres should have due regard to the need to prevent people being drawn into terrorism in compliance with the *Counter Terrorism and Security Act 2015* (UK).

This is maintained by ensuring:

- The DSL receives Prevent Referral training;
- All staff are aware of radicalisation via the online Prevent training;
- Risks relating to events, activities and initiatives within the Centre are identified;
- Completion of a full Prevent Risk Assessment with actions and strategies to reduce extremism;
- Reasonable steps are taken to research potential external speakers to ensure that they do not incite hatred, violence or call for the breaking of the law or are linked to organisations advocating extremism.

Please refer to the *External Speakers Policy (including Freedom of Speech)* for further information.

### 9. Students with health conditions (physical, emotional or mental) or learning differences

This includes students with a disability.

Study Group welcomes students with health conditions or learning differences and want to facilitate their success. To do this students are encouraged to disclose as part of the application and registration process so an effective support plan can be agreed and implemented in advance.

The DSL/DDSL will have an overview of the students and liaise with academic teams regarding reasonable adjustments in the classroom. It should be noted that information about

a student's health condition or learning difference will only be shared on a need-to-know basis, or if the student has given specific consent to do so.

All students who share a learning, health or disability support need will receive advice and general support. Where appropriate and available, they may be signposted to external and university services. However, the Centre does not provide direct professional medical and mental health support, so students must be able to self-manage their conditions. All students are encouraged to sign up with the local NHS GP services.

If any health condition (physical, emotional, or mental) results in poor attendance and a reduced capacity to learn, despite support, then the Centre reserves the right to defer the student's course as set out in the *Fitness to Study Policy*.

### 9.1. Mental health

The Centre plays an important role in supporting the mental health and wellbeing needs of all students and understands that transition to a new country and to higher education can present challenges. The Centre also understands that students may arrive with pre-existing mental health conditions or present with new conditions as they progress with their study and as such there are many opportunities to share these both before arrival and at any time after. This enables the Centre to make any adjustments required to enable the student/s to study effectively and maximise their student experience.

Welfare support is available for students with emerging mental health issues who can be signposted to university and local services. The Centre also aims to support all students with access to mental health support and to interventions that can improve academic achievement, social and emotional skills, reduce anxiety and stress and positively affect poor attendance.

Mental health is included within the safeguarding awareness training. In addition, all staff members are made aware that:

- Mental health concern could be an indicator of abuse (current and/or historic), neglect or exploitation;
- They must not attempt to diagnose a potential mental health concern;
- As staff who regularly see students, they are best placed to see changes in behaviour that could suggest a potential mental health concern;
- Abuse, neglect, and childhood trauma can negatively affect the student's mental health, behaviour and education;
- Concerns about a student's mental health must be raised with the Welfare Team.

If a mental health concern results in poor attendance, a reduced capacity to learn and or the student is unable to keep themselves safe or live independently, then the Centre reserves the right to defer the student's course as per the *Fitness to Study Policy*.

## 10. Fitness to Study

The Centre is committed to supporting students with health conditions (physical, mental and emotional), learning differences or disabilities to achieve their best possible outcomes and, where appropriate, provide reasonable adjustments so that all students can access their learning.

However, the Centre also recognises that there will be instances where a student's physical, mental or emotional health would give rise to concerns about the student's fitness to study. In these cases, the decision to defer the student's course will sit with the Centre Director, with the assistance of the Welfare staff. If deferment is considered to be in the best interests of the student by the DSL, this decision may be made without the agreement of the student. Deferment will result in a student returning home for care to support their recovery. In making such decisions, centres should always ask the question "Can we keep the student safe?".

Please refer to the *Fitness to Study Policy* and the *Exit Plan Procedure* for additional information.

## 11. Record Keeping

### 11.1. Concerns about students

All concerns should be logged in C-POMS. It is important that notes only record the facts as presented by the student. Notes on the discussions, decisions made and the reasons for the decision should also be recorded in writing. This information should be kept confidential and stored securely in local welfare files.

It should contain:

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

The DSL should ensure all personal information is processed fairly and lawfully and kept safe and secure in line with the *Data Protection Act 2018* & UK GDPR. Note this does not prevent the sharing of information for the purposes of safeguarding children or an adult at risk when it is necessary, proportionate, and justified to do. See the *Principles of Sharing Information*.

### 11.2. Allegations against a member of staff

#### i. Do not meet the threshold of harm

All concerns should be recorded in writing and include details of the concern, the context it arose, any action taken and the name of the person sharing their concern.

These records must be kept confidential, held securely and comply with the *Data Protection Act 2018* and UK GDPR. The information may only be shared with the Centre Director and HR advisor. The information should be kept until the person leaves their employment with the Centre.

#### ii. Meet the threshold of harm:

Where an allegation is found to be false or malicious it should be removed from the person's records. Where the allegation is substantiated, unfounded or unsubstantiated the following must be kept on file for a period of 10 years:

- Clear and comprehensive summary of the allegation;
- Details of how it was followed up and resolved;
- A note of action taken, decisions reached and the outcome;
- A copy provided to the person concerned and a declaration on whether the information will be referred to in any future reference.

## 12. Equality and Inclusion

The Centre has a diverse community of students (and staff) who are expected to respect each other. Study Group gives due regard to the *Equality Act 2010* and everyone is expected to take a role in promoting equality and embracing diversity.

The Centre embraces and celebrates the diversity of religions and denominations among its students; and practical provision for students to observe their religion can be made during their stay however this must not compromise the Centre's educational aims or an individual student's ability to learn and develop. Failure to respect student peers or Centre staff will result in disciplinary action. Please refer to *Section 5* for further information on raising concerns about students.

## 13. Additional

### 13.1. Searches and seizures

If it is suspected or reported that a student is in possession of drugs (or other illegal substance), weapons or other items that could cause harm to themselves or others on Study Group premises, the Centre Director may authorise a search of the student, their room and their belongings in line with the government guidance on *Searching, screening and confiscation, January 2018*.

If drugs, weapons or other illegal items are discovered then these will be confiscated, and the police will be notified in accordance with the relevant legislation. If an electronic device has been used, or suspected of being used to commit an offence, cause personal injury or damage to property, the Centre Director may authorise staff to examine any data or files held on the device. If a crime has been committed, the Police will be notified.

Where the premises belong to the partner university, their policies would apply.

### 13.2. The use of reasonable force

As the *Use of Reasonable force, July 2013* guidelines state, the application of reasonable force or physical restraint is up to the professional judgement of the staff member involved. It must be applied on a case-by-case basis and never as a default response to difficult situations. It must never be used as a punishment.

Reasonable force can also be applied when searching students for illegal items i.e. drugs or weapons, or for the confiscation of items. In the event a staff member is required to use reasonable force, they must always do this safely. If this is not possible then the site security or local police must be contacted. The Centre Director must be informed immediately when reasonable force has been used.

### 13.3. Visitors

Visitors are welcomed in the Centre where it is appropriate and will not impact the safety and welfare of students or staff.

All visitors to the Centre should be recorded in a visitor book and must be appropriately supervised. This applies regardless of whether the visit is arranged or unannounced.

If concerns are raised about a visitor this should be reported to the Centre Director or the DSL immediately. On occasion, it may be necessary to call the site security or the local police.

Please refer to the Study Group *Health & Safety Policy* for further information.

#### 13.4. Off-site trips and visits

Trips and visits may be organised by the Centre, either as student social events or as part of curriculum delivery. These will be arranged with the approval of the Centre Director and supported by appropriate staff. A risk assessment will also be in place to ensure that risks have been properly identified and mitigated against.

If the trip or visit includes a significant number of students who are under 18, then additional staff supervision will be appointed to ensure that safeguarding is maintained.

In the event a student who is under 18 goes missing during a trip or visit, then staff must manage this in line with *Section 7.2*.

## Appendix 1: DSL Contact Information (and Local Safeguarding Contact Points)

Centre	DSL/DDSL	(LA) Designated Officer	Multi-Agency Safeguarding Hubs (Children)	Vulnerable Adults
Durham ISC	DSL: Lottie Coley  DDSLs: Nicola Crossman, Vicky Howes, Helen Siddle, Heather Watson, Donna Cutler	Phil Curtis on 01429 401844 <a href="mailto:LADO@hartlepool.gov.uk">LADO@hartlepool.gov.uk</a> <a href="http://csx.gov.uk">csx.gov.uk</a>	01429 284284/01642 130080 Out of hours: 01642 524552 <a href="mailto:childrenshub@hartlepool.gov.uk">childrenshub@hartlepool.gov.uk</a>	Working hours: 01642 527764 Out of hours: 01642 524552 <a href="mailto:FirstContactAdults@stockton.gov.uk">FirstContactAdults@stockton.gov.uk</a>
Huddersfield ISC	DSL: Leanne Atack  DDSL: Claire O'Brien	01484 221 126 <a href="mailto:LADO.cases@kirklees.gov.uk">LADO.cases@kirklees.gov.uk</a>	24 hours: 01484 456848	0300 304 555/01484 414933(after hours) <a href="mailto:gatewaytocare@kirklees.gov.uk">gatewaytocare@kirklees.gov.uk</a>
Kingston ISC	DSL: Yvonne Silk-Jones (from 22.08.2024)  DDSLs: TBC	020 8891 7370 or 07774 332675 <a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a>	020 8547 5008 Out of hours: 020 8770 5000 <a href="mailto:lscb-support@kingrichlscb.org.uk">lscb-support@kingrichlscb.org.uk</a>	020 8547 5005 Out of hours: 020 8770 5000 <a href="#">Safeguarding Concern Form</a>
Leeds ISC	DSL: Shaun Curley  DDSLs: Anna Smith, Rosemary Brough	0113 3789687 <a href="mailto:LADO@leeds.gov.uk">LADO@leeds.gov.uk</a>	0113 376 0336 Out of hours: 0113 535 0600 Email: For referral forms only: <a href="mailto:ChildScreening@leeds.gov.uk">ChildScreening@leeds.gov.uk</a>	0113 222 4401 <a href="mailto:Leedsadults@leeds.gov.uk">Leedsadults@leeds.gov.uk</a> Out of hours: 0113 378 0644 <a href="mailto:edt.ss@leeds.gov.uk">edt.ss@leeds.gov.uk</a>
Liverpool John Moores ISC	DSL: Charlotte Loughead  DDSLs: TBC	Mark Goddard on 0151 233 0840 Mobile 0771 670 2034 Deputy: Pauline Trubshaw on 0151 233 0846 Mobile: 0784 172 7309 <a href="mailto:LADO@liverpool.gov.uk">LADO@liverpool.gov.uk</a> <a href="#">LADO Referral Form</a>	24 hours: 0151 233 3700 Follow up only - referral form: <a href="#">Children at risk (MARF referrals) - Liverpool City Council</a>	24 hours: 0151 233 3800 <a href="#">Safeguarding Concern Form</a>
Royal Holloway ISC	DSL: Jen Warry  DDSLs: Abby Barnes, Brooke Williams	0300 123 1650 (option 3) <a href="mailto:LADO@surreycc.gov.uk">LADO@surreycc.gov.uk</a>  <a href="#">Surrey LADO Referral form</a>	Working hours: 0300 470 9100 <a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a>  Out of hours: 01483 517898 <a href="mailto:edt.ssd@surreycc.gov.uk">edt.ssd@surreycc.gov.uk</a>	0300 470 9100 Out of hours: 01483 517 898 <a href="mailto:ascsmash@surreycc.gov.uk">ascsmash@surreycc.gov.uk</a>  <a href="#">Adult Safeguarding Referral Form</a>

Surrey ISC	DSL: Shelley Knight  DDSL: TBC	0300 123 1650 (option 3) <a href="mailto:LADO@surreycc.gov.uk">LADO@surreycc.gov.uk</a>  <a href="#">Surrey LADO Referral form</a>	Working hours: 0300 470 9100 <a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a>  Out of hours: 01483 517898 <a href="mailto:edt.ssd@surreycc.gov.uk">edt.ssd@surreycc.gov.uk</a>	0300 470 9100 Out of hours: 01483 517 898 <a href="mailto:ascmash@surreycc.gov.uk">ascmash@surreycc.gov.uk</a>  <a href="#">Adult Safeguarding Referral Form</a>
Sussex ISC	DSL: Helyn Soud  DDSLs: Vik Mutore, Harriet Rees	Darrel Clews on 01273 295643 or 07795335879 <a href="mailto:darrel.clews@brighton-hove.gov.uk">darrel.clews@brighton-hove.gov.uk</a>	Working hours: 01273 290400 Out of hours: 01273 335 905 or 01273 335 906. <a href="mailto:FrontDoorForFamilies@brighton-hove.gov.uk">FrontDoorForFamilies@brighton-hove.gov.uk</a>	01273 295555 <a href="mailto:hascsafeguardinghub@brighton-hove.gov.uk">hascsafeguardinghub@brighton-hove.gov.uk</a>  <a href="mailto:accesspoint@brighton-hove.gov.uk">accesspoint@brighton-hove.gov.uk</a>
Sheffield ISC	DSL: Sarah J Wood  DDSL: Ben Lee, Charlotte Nicholson	Jane Walker on 0114 205 2890 or 07815966791 <a href="mailto:jane.walker@sheffield.gov.uk">jane.walker@sheffield.gov.uk</a>  Referrals: Complete <a href="#">LADO Referral form</a> and send to <a href="mailto:shefieldsafeguardinghub@sheffield.gov.uk">shefieldsafeguardinghub@sheffield.gov.uk</a>	24 hours: 0114 273 4855 <a href="mailto:shefieldsafeguardinghub@sheffield.gov.uk">shefieldsafeguardinghub@sheffield.gov.uk</a>	24 hours: 0114 273 4908  Or, complete the <a href="#">Safeguarding adults concern form</a> and email it to <a href="mailto:asc.howdenhouse@sheffield.gov.uk">asc.howdenhouse@sheffield.gov.uk</a>
Teesside ISC	DSL: Liam Bell  DDSL: Laura Morris	Peter Storey on 01642 726004 <a href="mailto:middlesbroughlado@middlesbrough.gov.uk">middlesbroughlado@middlesbrough.gov.uk</a>	01642 726004 Out of hours: 01642 524 552 <a href="mailto:MiddlesbroughMACH@middlesbrough.gov.uk">MiddlesbroughMACH@middlesbrough.gov.uk</a>	01642 065 070 Out of hours: 01642 524 552 <a href="mailto:adultaccessteam@middlesbrough.gov.uk">adultaccessteam@middlesbrough.gov.uk</a>



## Appendix 2: Prevent Contact Information

Centre	HE/FE Prevent Coordinator	Police Prevent Coordinator
Durham ISC	<b>North East and Yorkshire</b> Chris Sybenga <a href="mailto:chris.sybenga@education.gov.uk">chris.sybenga@education.gov.uk</a> 07384 456 640	Marc Stephenson <a href="mailto:Marc.Stephenson@stockton.gov.uk">Marc.Stephenson@stockton.gov.uk</a> or <a href="mailto:prevent@stockton.gov.uk">prevent@stockton.gov.uk</a> 01642 527173 Police Prevent Team: 01642 303397 or 01642 301330
Huddersfield ISC	<b>North East and Yorkshire</b> Chris Sybenga <a href="mailto:chris.sybenga@education.gov.uk">chris.sybenga@education.gov.uk</a> 07384 456 640	Kirklees Prevent Hub: 01924 483747 <a href="mailto:prevent@kirklees.gov.uk">prevent@kirklees.gov.uk</a>
Kingston ISC	<b>London</b> Jennie Fisher <a href="mailto:jennie.fisher@education.gov.uk">jennie.fisher@education.gov.uk</a> 07880 469 588	<a href="mailto:prevent@kingston.gov.uk">prevent@kingston.gov.uk</a>  SPA: 0208 547 5008 Out of hours: 020 8770 5000
Leeds ISC	<b>North East and Yorkshire</b> Chris Sybenga <a href="mailto:chris.sybenga@education.gov.uk">chris.sybenga@education.gov.uk</a> 07384 456 640	0113 241 3386 or 0113 535 0810 <a href="mailto:prevent@leeds.gov.uk">prevent@leeds.gov.uk</a>
Liverpool John Moores ISC	<b>North West</b> Nigel Lund <a href="mailto:nigel.lund@education.gov.uk">nigel.lund@education.gov.uk</a> 07384 452 146	Merseyside Police Prevent Team: 0151 777 4878
Royal Holloway ISC	<b>South East</b> Helene Morris <a href="mailto:helene.morris@education.gov.uk">helene.morris@education.gov.uk</a> T: 02045666324; M: 07901384401	Claire McDonald: 01483 632982 Mobile 07795 043842 <a href="mailto:claire.mcdonald@surrey.pnn.police.uk">claire.mcdonald@surrey.pnn.police.uk</a> <a href="mailto:preventreferrals@surrey.pnn.police.uk">preventreferrals@surrey.pnn.police.uk</a>
Surrey ISC	<b>South East</b> Helene Morris <a href="mailto:helene.morris@education.gov.uk">helene.morris@education.gov.uk</a> T: 02045666324; M: 07901384401	Claire McDonald: 01483 632982 Mobile 07795 043842 <a href="mailto:claire.mcdonald@surrey.pnn.police.uk">claire.mcdonald@surrey.pnn.police.uk</a> <a href="mailto:preventreferrals@surrey.pnn.police.uk">preventreferrals@surrey.pnn.police.uk</a>
Sussex ISC	<b>South East</b> Helene Morris <a href="mailto:helene.morris@education.gov.uk">helene.morris@education.gov.uk</a> T: 02045666324; M: 07901384401	Thomas Morvan-Toone: 101 ext. 550543 07786 114158 <a href="mailto:thomas.morvantoone@sussexpnn.police.uk">thomas.morvantoone@sussexpnn.police.uk</a>
Sheffield ISC	<b>North East and Yorkshire</b> Chris Sybenga <a href="mailto:chris.sybenga@education.gov.uk">chris.sybenga@education.gov.uk</a> 07384 456 640	01142 734076 or 0114 2523217 <a href="mailto:preventsouth@ctpne.police.uk">preventsouth@ctpne.police.uk</a>
Teesside ISC	<b>North East and Yorkshire</b> Chris Sybenga <a href="mailto:chris.sybenga@education.gov.uk">chris.sybenga@education.gov.uk</a> 07384 456 640	Andy Shippey: 01642 728690 <a href="mailto:Andrew_Shippey@middlesbrough.gov.uk">Andrew_Shippey@middlesbrough.gov.uk</a> <a href="mailto:communitysafety@middlesbrough.gov.uk">communitysafety@middlesbrough.gov.uk</a>

### Appendix 3: Additional Contact Information

Name	Position	Telephone Number	Email
Victoria Bentley	Deputy HR Director	07468696857	<a href="mailto:victoria.bentley@studygroup.com">victoria.bentley@studygroup.com</a>
Mel Adasa	Senior HR Business Partner	07825 094605	<a href="mailto:melissa.adasa@studygroup.com">melissa.adasa@studygroup.com</a>
Marilyn Aslam	Senior HR Business Partner	07979 346365	<a href="mailto:maslam@studygroup.com">maslam@studygroup.com</a>
Justine Martin	Senior HR Business Partner	07920 847432	<a href="mailto:jmartin@studygroup.com">jmartin@studygroup.com</a>
Alison Baines	Student Experience Director	07467 940089	<a href="mailto:abaines@studygroup.com">abaines@studygroup.com</a>
Olly Walker	Associate Director Student Wellbeing	01273 005102	<a href="mailto:owalker@studygroup.com">owalker@studygroup.com</a>
Jen Warry	Student Wellbeing Lead	01273 944588	<a href="mailto:jwarry@studygroup.com">jwarry@studygroup.com</a>
Rachael Shields	Student Experience Quality Coordinator	01273 944517	<a href="mailto:rshields@studygroup.com">rshields@studygroup.com</a>

## Appendix 4: Indicators of Abuse and Neglect

Taken from the NSPCC *Definitions and signs of child abuse – guidance for professionals who work with children on how to recognize the signs of child abuse.*

### **The physical signs of abuse may include:**

- Multiple injuries (such as bruising, fractures) inflicted at different times
- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises - in clusters, often on the upper arm, outer thigh
- Any burns that have a clear shape of an object e.g. cigarette burns
- Large oval shaped bite marks
- Broken bones
- Scalds, with upward splash marks, multiple burns with a clearly demarcated edge
- Cuts

### **Changes in behaviour that can also indicate physical abuse:**

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depressive, anxiety and eating disorders
- Suicidal thoughts and feelings
- Withdrawn behaviour
- Running away from home
- Risk taking behaviour

### **Changes in behaviour which can indicate emotional abuse include:**

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders, or use of language in a way not expected for age
- Self-harm
- Fear of parent being approached regarding their behaviour
- Struggle to control strong emotions or have extreme outbursts
- Seem isolated from parents

### **The physical signs of sexual abuse may include:**

- Anal or vaginal soreness or itching
- Bruising or bleeding near genital area
- Sexually transmitted infections (STI)
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

### **Changes in behaviour which can also indicate sexual abuse include:**

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Avoiding spending time with specific people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level

- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Risky behaviour such as substance misuse, offending and risky sexual behaviour
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults

**The physical signs of neglect may include:**

- Constant hunger, sometimes stealing food from other children
- Constantly dirty or 'smelly'
- Loss of weight, or being constantly underweight
- Inadequate clothing for the weather conditions
- Untreated injuries, health or dental problems

**Changes in behaviour which can also indicate neglect may include:**

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised.
- Poor diet leading to obesity or malnourishment

Further information is available from:

<https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>



Title	Safeguarding Policy - England
Version	4.4
Date	30 July 2024
Author	Ali Baines, Student Experience Director
Owner	Ali Baines, Student Experience Director

Student Experience Directorate