



### Safeguarding Policy Academic year 2025-2026

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## 1 Safeguarding.

This section contains information on what the company should do and sets out the legal duties with which it must comply with in order to keep children safe. This guidance should be read and followed by all staffs of Write-Trak, all directors of Write-Trak, and all staff self-employed working for Write-Trak.

Safeguarding is a term used to refer to the duties and responsibilities that those providing a health, social or education services have to carry out / perform to protect individuals and vulnerable people from harm. Following the publication of the [Safeguarding Vulnerable Groups Act in \(2006\)](#), a vetting and barring scheme was established in Autumn 2008. Staffs who work with children and / or vulnerable adults, will be required to undertake a DBS check.

A vulnerable child is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'. Department of Health (2000)

Write-Trak consider it crucial that students know that their safety is of paramount importance to the tutor and the company, and that everyone has a responsibility for this. This information is communicated in various ways, i.e., through staff and student handbooks, marketing materials, induction procedures, student contracts, tutorials, reviews and student focus / involvement groups.

Write-Trak recognises the importance of its work with children and young people and adults in need of protection and its responsibility to protect everyone entrusted to our care. We are committed to the safeguarding of children and adults with care and support needs and ensuring their well-being.

### **Specifically:**

- We recognise that we all have a responsibility to help prevent the physical, sexual, emotional abuse and neglect of children and young people (those under 18 years of age) and to report any such abuse that we discover or suspect.
- We believe every child should be valued, safe and happy. We want to make sure that children we have contact with know this and are empowered to tell us if they are suffering harm.
- All children and young people have the right to be treated with respect, to be listened to and to be protected from all forms of abuse.
- We recognise that we all have a responsibility to help prevent the physical, sexual, psychological, financial and discriminatory abuse and neglect of adults who have care and support needs and to report any such abuse that we discover or suspect.
- We recognise the personal dignity and rights of adults who find themselves victims of forced marriage or modern slavery and will ensure all our policies and procedures reflect this.
- We undertake to exercise proper care in the appointment and selection of all those who will work with children and adults with care and support needs.

**We are committed to:**

- Following the requirements for UK legislation in relation to safeguarding children and adults and good practice recommendations.
- Respecting the rights of children as described in the UN Convention on the Rights of the Child.
- Implementing the requirements of legislation in regard to people with disabilities.
- Ensuring that workers adhere to the agreed procedures of our safeguarding policy.
- Keeping up to date with national and local developments relating to safeguarding.
- Following company and organisational guidelines in relation to safeguarding children and adults in need of protection.
- Supporting the safeguarding co-ordinator/s in their work and in any action, they may need to take in order to protect children and adults.
- Ensuring that everyone agrees to abide by these recommendations and the guidelines established.
- Supporting parents and families.
- Nurturing, protecting and safeguarding of children and young people.
- Supporting, resourcing, training, monitoring and providing supervision to all those who undertake this work.
- Supporting all in the company affected by abuse.

**We recognise:**

- Children's Social Services (or equivalent) has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about a child.
- Adult Social Care (or equivalent) has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about an adult with care and support needs.
- Where an allegation suggests that a criminal offence may have been committed then the police should be contacted as a matter of urgency
- Safeguarding is everyone's responsibility.

Write-Trak will put in place appropriate safeguarding responses to children who go missing from education, 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 their going missing in future.

Any concerns for a child or adult with care and support needs will be raised with one of the following, who have been approved as safeguarding officers for this organisation:

- Designated Child Safeguarding Coordinator / Lead (DSL) – Paul Blacker
- Assistant / Deputy Child Safeguarding Coordinator / Lead (ADSL) – Gerry McMahon

## **1.1 Safeguarding officers.**

### **1.1.1 The designated safeguarding lead (DSL).**

Write-Trak will appoint an appropriate senior member of staff, from the leadership team, to the role of DSL. They will take lead responsibility for safeguarding and child protection. They will have the appropriate status and authority within the company to carry out the duties of the post. Write-Trak will provide the time, funding, training, resources and support. This will enable the DSL to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter- agency meetings – and / or to support other staff to do so – and to contribute to the assessment of children.

The DSL and any deputies should liaise with the local authority and work with other agencies in line with Working together to safeguard children.

During term time, the designated safeguarding lead and or a deputy will be available (during working hours) for staff in Write-Trak to discuss any safeguarding concerns.

The designated safeguarding lead and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.

### **1.1.2 Deputy DSL's (DDSL).**

It is a matter for company as to whether they choose to have one or more deputies designated safeguarding lead(s). Any deputies should be trained to the same standard as the designated safeguarding lead. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL; this lead responsibility should not be delegated.

## **1.2 Referrals.**

The DSL is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.
- Work with others

### **1.3 Liaising.**

The DSL is expected to:

- Liaise with the director to inform him or her of issues especially on-going enquiries under [section 47 of the Children Act 1989](#) and police investigations;
- As required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

### **1.4 Training.**

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The DSL should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school or college’s child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;

and

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them

### **1.5 Availability.**

During term time the DSL (or a deputy) should always be available (during school or tutor hours) for staff to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for Write-Trak, working with the DSL, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for Write-Trak and the designated / assistant safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours / out of term activities.

### **1.6 Raise Awareness.**

The DSL in collaboration with the company should:

- Ensure the company’s child protection policies are known, understood and used appropriately
- Ensure the company’s child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the company in this
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

### **1.7 Inter-agency working.**

Write-Trak recognise the importance of information sharing between professionals and local agencies. We will ensure that we contribute to inter-agency working in line with statutory guidance, working together to safeguard children. Write-Trak will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

Write-Trak will ensure that their safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the LSCB. This should include understanding and reflecting local protocols for assessment and the LSCB’s threshold document along with supplying information as requested by the LSCB.

Whilst Data Protection and the GDPR places duties on Write-Trak and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Although inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.

### **1.8 Staff training.**

Write-Trak will ensure that all staff members undergo safeguarding and child protection training at induction. The training will be regularly updated. Induction and training should be in line with advice from the LSCB.

In addition, all staff members should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Write-Trak recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

### **1.9 Online safety.**

As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.

### **1.10 Opportunities to teach safeguarding.**

Write-Trak will ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social, health and economic education (PSHE).

Write-Trak see it as essential to ensure that appropriate filters and monitoring systems are in place, and are mindful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

### **1.11 Safer recruitment.**

Write-Trak will where possible prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. Write-Trak has written recruitment and selection policies and procedures in place.

### **1.12 Allegations.**

#### **1.12.1 Against teachers / tutors, volunteers and other staff.**

Write-Trak will ensure there are procedures in place to handle allegations against teachers, volunteers and other staff. Such allegations should be referred to the designated officer(s) at the local authority by the appropriate person as set out in Part four of this guidance.

There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) 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 a legal duty and failure to refer when the criteria are met is a criminal offence.

The student would be removed from the tutor's home immediately. Support would be given to both parties involved. Both the student and the tutor would be asked to complete an incident form, independently, as soon as possible after the alleged incident took place. In this they would record their version of events. Any witnesses would also be invited to complete a form. The allegations would be fully investigated by an independent person or body. The appropriate authorities would also be informed.

#### **1.12.2 Abuse made against other children.**

Staff should recognise that children are capable of abusing their peers. Write-Trak will ensure their child protection policy includes procedures to minimise the risk of peer-on-peer abuse and sets out how allegations of peer-on-peer abuse will be investigated and dealt with. The policy reflects the different forms peer on peer abuse can take, make clear that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". It should be clear as to how victims of peer-on-peer abuse will be supported.

Peer on peer abuse can manifest itself in many ways. The Company will ensure that sexting and the company's approach to it is reflected in the child protection policy. The department provides searching screening and confiscation advice for schools. The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published sexting advice for schools and colleges.

The company will ensure the child protection policy reflects the different gender issues that can be prevalent when dealing with peer-on-peer abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

#### **1.13 The child's wishes.**

Where there is a safeguarding concern, Write-Trak will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at their heart.

#### **1.14 Looked after children.**

The most common reason for children becoming looked after is as a result of abuse and / or neglect. Write-Trak will ensure that staffs have the skills, knowledge and understanding necessary to keep looked after children safe.

Write-Trak will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him / her.

### **1.15 Children with special educational needs and disabilities.**

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Write-Trak will ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

### **1.16 Child protection files.**

Where children leave Write-Trak ensure their child protection file, if it exists, is transferred to the new school or college as soon as practically possible. This should be transferred separately from the main student file, ensuring safe and secure transit and confirmation of receipt should be obtained.

### **1.17 Staff responsibilities.**

Safer Practice, Safer Learning (NIACE, 2007) recommends that Safeguarding duties extend to whole organisation policies, values and ethos, and include all staff and students. It is everyone's duty to promote the concepts of the safe student.

#### **1.17.1 Staff should know and do.**

The company operates a child centered and coordinated approach to safeguarding. Write-Trak and its staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working together to safeguard children  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centered. This means that they should consider, at all times, what is in the best interests of the child.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Children include everyone under the age of 18.

### **1.17.2 Staff / Tutor roles.**

These are important aspects, which form part of the responsibility as a tutor. There is a duty of care to ensure students are able to learn and achieve in a safe environment. The company consider that it is very important that all staff are aware of the legal and national guidance relating to safeguarding and protecting young people and vulnerable adults. The company ensure that regular and on-going training is undertaken by all staff to keep them and the company up to date with the relevant legislation and regulations.

Write-Trak staffs are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating. All staffs have a responsibility to provide a safe environment in which children can learn.

Write-Trak DSL will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

Write-Traks' staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

Any staff member who has a concern about a child's welfare should follow the referral processes set out in this document. Staff may be required to support social workers and other agencies following any referral.

### **1.17.3 What staff need to know.**

All staff members should be aware of systems within Write-Trak which support safeguarding and these should be explained to them as part of staff induction. This will include but are not exclusively the following:

- Staff code of professional conduct
- Tutorial Staff policy
- Safeguarding section including the role of the designated safeguarding lead.

All staff members will receive appropriate safeguarding and child protection training, which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, 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.

All staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the [Children Act 1989](#) that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them he / she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children's social care. Staff should never promise a child that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child.

Under the [Children Act 1989](#), local authorities are required to provide services for children in need in their area for the purposes of safeguarding and promoting their welfare. Local authorities undertake assessments of the needs of individual children to determine which services to provide and what action to take. This can include:

Section 17- A child in need is defined under section 17(10) of the Children Act 1989 as: a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled".

Section 47- If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm they have a duty to make enquires under section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare. This duty also applies if a child is subject to an emergency protection order (under section 44 of the Children Act 1989) or in police protective custody under section 46 of the Children Act 1989.

#### **1.17.4 What staff should look out for.**

A vulnerable child can be put at risk of harm through a variety of actions, inadequate policies and procedures, and failures to act. There are six types of abuse defined by the Department of Health:

1. Physical
2. Sexual
3. Psychological / emotional
4. Financial or material
5. Neglect and acts of omission
6. Discriminatory

#### **1.17.5 Suspicion of Abuse.**

1. Changes in a child's behaviour or appearance will be investigated and referred to social services.
2. Responding to a child who speaks of abuse will be investigated and referred to social services.
3. Suspicions of abuse will be investigated and referred to social services.

Tutors must not forget, however, that any young person or adult could potentially be the victim of abuse. It is therefore your duty to ensure that you take proper steps to safeguard your students.

Whenever worrying changes are observed in a child's behaviour, physical condition or appearance, a specific and confidential record will be set up, quite separate from the usual on-going records of the

child's progress and development. Such records will be kept in a separate file and will only be accessible to appropriate agencies.

All Write-Trak staff members should be aware of the types of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Types of abuse and neglect, and examples of safeguarding issues are described later in this guidance. Government Departmental advice is available here

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused-2>.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure, they should always speak to the designated safeguarding lead.

#### **1.17.6 If staff / tutors have concerns about a child.**

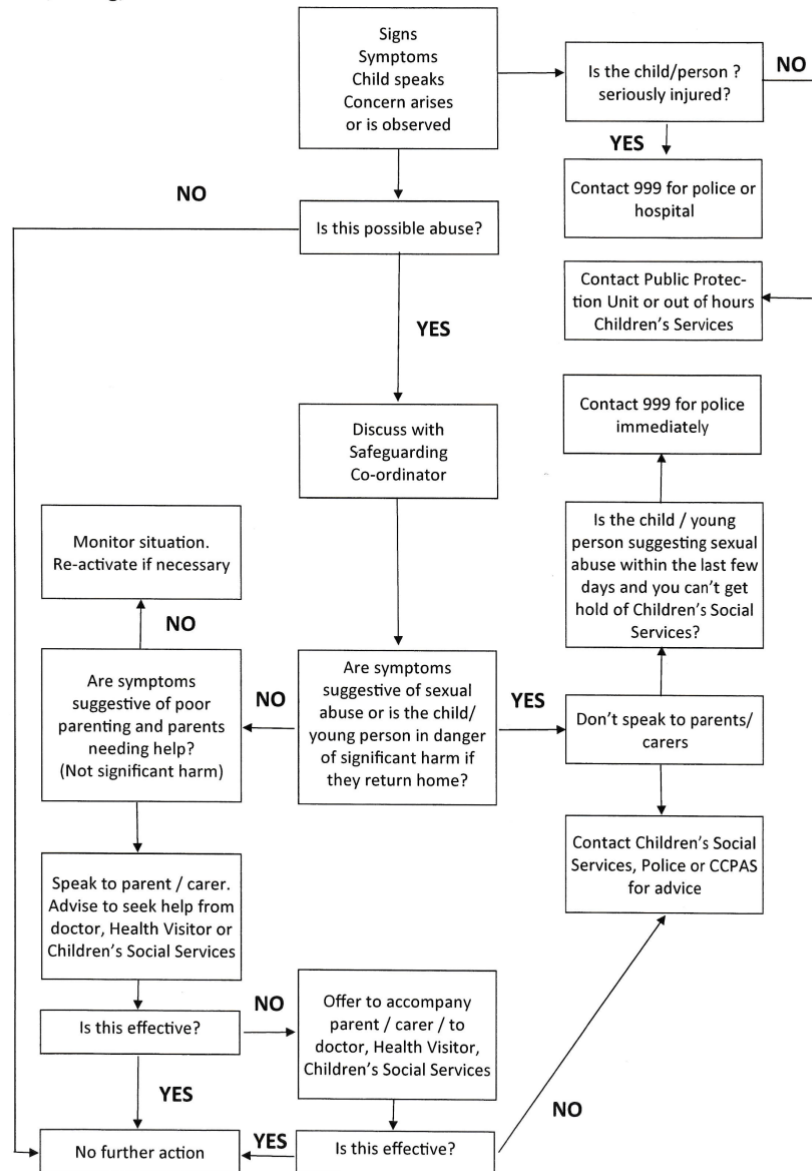
If staff members have any concerns about a child (as opposed to a child being in immediate danger - see later in this document) they will need to decide what action to take. Where possible, there should be a conversation with the DSL to agree a course of action, although any staff member can make a referral to children's social care.

Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Board.

If anyone other than the designated safeguarding lead makes the referral, they should inform the designated safeguarding lead as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming. The online tool Reporting child abuse to your local council directs staff to their local children's social care contact number.

If a young person or vulnerable adult discloses abuse to a tutor, they should take the disclosure seriously and never dismiss any allegation of abuse. Provide a quiet and supportive environment to help the student feel at ease.

See flow chart setting out the process for staff when they have concerns about a child.



If, after a referral, the child's situation does not appear to be improving, the DSL (or the person who made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

If early help is appropriate, the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help or other support is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

If a tutor, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See Annex A for further details.

#### **1.17.7 A child is in danger or at risk of immediate harm.**

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the designated safeguarding lead, the designated safeguarding lead should be informed as soon as possible that a referral has been made. Reporting child abuse to your local council directs staff to their local children's social care contact number.

#### **1.17.8 Concerns about another staff member.**

If staff members have concerns about another staff member, then this should be referred to the director of Write-Trak. In the event of allegations of abuse being made against the director of Write-Trak allegations should be reported directly to the designated officer(s) at the local authority. Staff may consider discussing any concerns with the school's designated safeguarding lead and make any referral via them.

#### **1.17.9 Concerns about safeguarding practices within the company.**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in Write-Trak's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with Write-Trak's senior leadership team.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them: General guidance can be found at Advice on whistleblowing <https://www.gov.uk/whistleblowing>. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 0280285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **1.18 Types of Abuse and neglect.**

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

#### **1.18.1 Abuse.**

Defined as 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

#### **1.18.2 Physical abuse.**

A form of abuse which 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.

#### **1.18.3 Emotional abuse.**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), 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 of a child, although it may occur alone.

#### **1.18.4 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### **1.18.5 Child sexual exploitation.**

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

#### **1.18.6 Neglect.**

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. 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### **1.18.7 Anti-bullying.**

Bullying is a common form of deliberately hurtful behaviour, usually repeated where it is difficult for victims to defend themselves. It can take many forms, including; physical e.g. hitting, kicking, theft, verbal e.g. racist or homophobic remarks, threats, name calling; emotional e.g. isolating an individual from social activities / acceptance of their peer group, cyber bullying; using internet or mobile phone.

Damage inflicted by bullying is often underestimated and can cause considerable distress to children to the extent that it affects their health and development. In the extreme it can cause significant harm, including self-harm.

The company does not tolerate any bullying in any form, and takes all issues of bullying extremely seriously.

As soon as an incidence of bullying has been brought to the attention of the company is noted by the company, the employee, or student involved will be removed from the situation and other student(s) involved as soon as is practicably possible.

The company will investigate the incident thoroughly. All parties involved will adopt an action plan, including the victim and the perpetrator.

The company has rigorously enforced anti-bullying strategies.

- 1) Student's parents / carers will be informed.
- 2) Additional disciplinary action may be added in line with existing practice on inappropriate language or behaviour.
- 3) If necessary, external agencies such as Social Networking or Email Member sites may be contacted and when applicable, police or local authorities may be involved.
- 4) The company will give all parties the chance to give their account of the incident(s), in writing.
- 5) Where appropriate observation of the student involved will take place
- 6) The situation will be reviewed at regular intervals until the matter has been dealt with to all parties' satisfaction.

The following are not permitted and are considered inappropriate by the company:

- 1) Sending or displaying offensive messages, images, videos or sound files (including chain emails).
- 2) Uploading images of the company students or use of the company's logo without prior written permission.
- 3) Using obscene language.
- 4) Harassing, insulting or attacking others.
- 5) Damaging computers, computer systems, printers or computer networks.
- 6) Violating copyright laws.
- 7) Using others' passwords or accounts.
- 8) 'Hacking' into others' folders, work or files for any reason.
- 9) Wasting the company resources.
- 10) Uploading onto websites or sharing personal addresses, telephone/fax numbers, photographs or videos of anyone (staff or students) of the company.

Bullying may involve an allegation of crime e.g., assault, theft, and harassment, and should be reported to the Police at the earliest opportunity. Police response will be in accordance with [Crime Reporting by Police Officers Working in Schools](#) (ACPO DfES Feb. 2004).

Where there are concerns about sexual abuse or serious / persistent physical or emotional abuse, advice should be sought from Children's Social Services / Children's Social Care.

### **1.19 Harassment.**

Harassment is either:

- 1) Unwanted conduct, whether verbal or not, which is of a sexual or racial nature or which refers to or is based upon a person's disability, or other conduct based on someone's race and/or gender and/or disability which affects the dignity of men or women at work; or
- 2) Bullying of colleagues, especially junior colleagues, by intimidatory behaviour; or
- 3) Unfavourable conduct at work, whether verbal or non-verbal, towards someone based on his/her disability which could affect his/her dignity at work.

Harassment or any form of discrimination will not be tolerated under any circumstances. A member of staff who harasses or discriminates against another employee or client or customer of the Company will be subject to the Company's disciplinary procedure. In serious cases, such behaviour may constitute gross misconduct and result in summary dismissal.

Harassment generally may include any unwanted verbal or physical abuse and/or advances and/or behaviour which an employee may find offensive and which causes them to feel threatened, humiliated, patronized, distressed or harassed. It will not necessarily be a defence that such incidents consist of words or behaviour which might be claimed to be "common place" or which were intended as a joke or were not intended to be offensive.

Harassment may be deliberate or unconscious, open or covert, direct or indirect, an isolated incident or a series of repeated actions. It may also include, in certain circumstances, off-duty conduct.

It is the duty and responsibility of the Company and every employee to stop all types of harassment and discrimination in the workplace. It is only through the efforts of individual employees that harassment and discrimination can be eradicated.

#### **1.19.1 Racial Harassment.**

Racial harassment is racial discrimination and it is also unlawful. This type of harassment will not be tolerated under any circumstances and the Company will take prompt action upon becoming aware that such incidents have taken place. Examples of racial harassment may include:

- 1) Abusive language and racist jokes;
- 2) Racial name calling;
- 3) The display or circulation of racially offensive written or visual material including graffiti;
- 4) Physical threats, assault and insulting behaviour or gestures;
- 5) Open hostility towards workers of a particular racial group, including organized hostility in the workplace;
- 6) Unfair allocation of work and responsibilities;
- 7) Exclusion from normal workplace conversation or social events, i.e. being "frozen out".
- 8) The above examples are not exhaustive and each incident of harassment or discrimination will be viewed on its individual facts.

### **1.19.2 Sexual Harassment.**

Sexual harassment is similarly sex discrimination, unlawful and contrary to the Company's equal opportunities policy. It is defined as unwanted behaviour of a sexual nature by one employee towards another. Examples of sexual harassment may include:

- 1) Insensitive jokes and/or pranks;
- 2) Lewd comments about appearance;
- 3) Unnecessary bodily or physical contact;
- 4) Displays of sexually offensive material, for example pin-ups and calendars;
- 5) Requests for sexual favours;
- 6) Speculation about an employee's private life and/or sexual activities;
- 7) Threatened or actual sexual violence;
- 8) Threat of dismissal, loss of promotion etc. for refusal of sexual favours.
- 9) Exclusion from normal workplace conversation and social events.

Whilst the above list gives examples of sexual harassment, harassment takes many forms from relatively mild sexual banter to actual physical violence. The above examples are not intended to be exhaustive. Harassment of an individual in this manner on the basis of their sexual orientation (i.e. because they are homosexual, transsexual or undergoing "sex change treatment") will also be regarded by the Company as sexual harassment and will not be tolerated.

### **1.19.3 Harassment on grounds of disability.**

Harassment of an individual who has a disability or who has had a disability in the past is unlawful. It is also contrary to the Company's equal opportunities policy, which seeks to ensure that people with disabilities receive treatment that is fair, equitable and consistent with their skills and abilities.

In accordance with statutory requirements, the Company recognizes that a person with a disability is someone who has or has had a physical or mental impairment that has a substantial and long-term adverse effect on his/her normal day-to-day activities. Therefore, depending on individual circumstances a person who has been seriously injured, has or had a progressive illness, significant learning difficulties or poor hearing, vision or mobility may be a person with a disability.

Harassment on grounds of disability may include the following:

- 1) Abusive or insensitive language;
- 2) Inappropriate jokes or pranks;
- 3) Non-verbal offensive gestures (e.g. staring at a particular affliction);
- 4) Inappropriate assumptions about the capabilities of a disabled person;
- 5) Unfair allocation of work and responsibilities;
- 6) Exclusion from normal workplace conversation or social events;
- 7) Physical mistreatment (e.g. jostling or assault).

The above examples are not exhaustive and each incident of harassment or discrimination will be viewed on its individual facts. As part of the Company's equal opportunities policy we will make every effort, if a disabled person joins the Company or if an existing employee becomes disabled, to make such adjustments as are required by law, whether in their existing job or in a suitable available alternative.

The Company will seek to ensure that the needs of people with disabilities are considered generally in both the context of the Company's working practices and in the nature of its premises and continuing services.

### **1.20 Victimisation.**

Victimisation occurs when a member of staff treats another member of staff less favourably because that other person has;

- 1) Brought proceedings alleging that he or she has been discriminated against contrary to this Policy; or
- 2) Indicated that they intend to make such a claim or claims; or
- 3) Assisted a colleague to make a claim.

Victimisation will not be tolerated under any circumstances and any member of staff who victimises another employee will be subject to the Company's disciplinary procedure. In serious cases, such behaviour may constitute gross misconduct resulting in summary dismissal.

### **1.21 Training.**

Employees involved in recruitment and the management or supervision of others will receive regular training to help them understand and comply with the law and our policy.

No employee will be denied access to training on discriminatory grounds.

Specific and / or additional training will be made available for disabled employees if requested or as is reasonably necessary.

### **1.22 Other safeguarding issues.**

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer-on-peer abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the [TES](#), [MindEd](#) and the [NSPCC](#) websites. Write-Trak staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- Bullying including cyberbullying
- Children missing education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage- and Annex A
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting
- Trafficking

#### **1.22.1 A child missing from education.**

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School and college staff should follow their procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Write-Trak should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. Further information about children at risk of missing education can be found in the Children Missing Education guidance.

Write-Trak will place students on the admission register at the beginning of the first day on which the company has agreed, or been notified, that the student will attend. If a student fails to attend on the agreed or notified date, the company should consider notifying the local authority at the earliest opportunity to prevent the child from going missing from education.

It is important that the admission register is accurate and kept up to date. The company should regularly encourage parents to inform them of any changes whenever they occur. This can assist the school and local authority when making enquiries to locate children missing education.

The company will monitor attendance and address it when it is poor or irregular, and will inform the local authority of any student who fails to attend regularly, or has been absent without permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Where a parent notifies a school that a student will live at another address, the company are required to record in the admission register:

- The full name of the parent with whom the student will live;
- The new address; and
- The date from when it is expected the student will live at this address.

Where a parent of a student notifies the school that the student is registered at another school or will be attending a different school in future, the company must record in the admission register: The company and local authorities should work together to agree on methods of making returns.

When making returns, the school should highlight to the local authority where they have been unable to obtain the necessary information from the parent.

It is important that the company comply with these duties, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow-up with any child who might be at risk of not receiving an education and who might be at risk of being harmed, exploited or radicalised.

#### **1.22.2 Honour based violence.**

So-called 'honour-based' violence (HBV) encompasses crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

There are ranges of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of [the Multi agency statutory guidance on FGM](#) (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi- agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

### **1.22.3 FGM mandatory reporting duty.**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the [Female Genital Mutilation Act 2003](#) (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#).

Teachers/Tutors must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college’s designated safeguarding lead and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

### **1.22.4 Forced marriage.**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk).

### **1.22.5 Preventing radicalisation.**

Protecting children from the risk of radicalisation should be seen as part of schools’ and colleges’ wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors

may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

#### **1.22.6 Prevent.**

From 1 July 2015, specified authorities, including all schools (and, since 18 September 2015, all colleges) as defined in the summary of this guidance, are subject to a duty under [section 26 of the Counter-Terrorism and Security Act 2015](#) (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the [Revised Prevent duty guidance](#); for England and Wales are specifically concerned with schools (but also cover childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

The company is expected to assess the risk of children 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 children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board.

Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.

The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to students at the school of being drawn into terrorism.

As a minimum, however, the company should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.

The company should ensure that children are safe from terrorist and extremist material when accessing the internet in teaching environments.

The Government has launched educate against hate, a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

There is an online e-module available here <http://www.elearning.prevent.homeoffice.gov.uk/>

#### **1.22.7 Channel.**

Company staff and employees should understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at:

<https://www.gov.uk/government/publications/channel-guidance>

Channel is a programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for the company to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

#### **1.23 Record keeping.**

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead.

#### **1.24 Monitoring.**

The Company will regularly monitor the effectiveness of its equal opportunities procedures to ensure that they are achieving our stated aims through the Internal and external quality assurance processes.

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