



Title	Safeguarding Policy & Procedures
Owner	Director (Annette Hall)
Review interval	Annually or sooner if there is a change in rules, regulations, or procedure
Date of last review	19/8/24

Updates		
Every review will not necessarily yield any changes if none are needed. There will only be comments below if a change was made		
Date	Version no.	Comments
03/06/20	1	
18/12/20	1.1	Minor text corrections for consistency
09/02/21	1.2	Added reference to Keeping Children Safe in Education guidance P5
22/07/21	1.3	Clarified information sharing (Flow chart P11) Update process charts – How to deal with concerns Reorganised order of some sections for easier reference
07/01/22	1.4	Added points of referral for Prevent Co-ordinators Added detail about signs of radicalisation / extremist behaviour.
04/05/22	1.5	Added section on Safeguarding Welfare (Potential and emerging needs)
19/7/22	1.6	Added specific detail regarding children and young people in sections: <ul style="list-style-type: none"> • How we Safeguard an Apprentice aged 16-17 • Behaviour code for adults working with children and young people • Behaviour code for children and young people • Sexting policy

Contents

Scope	2
Intent	2
What is Safeguarding?	2
Purpose:	3
Responsibilities	4
Promotion of Policy.....	5
Dealing with Allegations of Abuse.....	5
Allegations of Abuse against Grey Seal Academy Staff	6
Information Sharing	6
IT & Systems	8
Lone Working	8
Out of Hours Contact.....	8
Social Media.....	8
Monitoring & Review.....	8
Access to policy documentation, advice and support.....	9
Children in Need and Specific Safeguarding Issues	9
Confidentiality Agreement.....	10
Safeguarding Welfare (Potential and emerging needs).....	10
The Safeguarding Process (Disclosure)	10
When a Learner makes a disclosure to a Grey Seal Academy Staff member	11
When a Grey Seal Academy Staff Member identifies a potential / actual concern	11
When an Employer reports a concern to Grey Seal Academy	11
What to do next	12
How we Safeguard an Apprentice aged 16-17.....	13
When the LSDO considers that a Prevent Referral is required.	15
Policy Details; Definitions	15
Behaviour code for adults working with children and young people	23
Behaviour code for children and young people	25
Sexting policy	27



Contacts		
Role	Name	Contact details
Lead Designated Safeguarding Officer (LDSO)	Andrew Barnard	07477808337
Designated Safeguarding Officer (DSO)	Annette Hall	07463803297
During office hours (9am, - 5.30pm), support can also be sought by contacting 01773829121		

Where the following policy and procedure refers to DSO, this means any of the above-named Grey Seal Academy staff members

This safeguarding policy should be read in conjunction with the safeguarding guidance document and the following policies:

- Equality, Diversity and Inclusion
- Health and Safety
- Whistleblowing
- IT Policy
- Lone Working Policy
- Staff behaviour policy

Other Grey Seal Academy policies may additionally reference procedures that support Safeguarding and Prevent duties.

Scope

Grey Seal Academy is committed to maintaining the highest possible standards to meet its social, moral and legal responsibilities to safeguard the welfare of every child/young person or vulnerable adult (**see Policy Details; Definitions Section**) and thereby ensuring a safe and friendly environment, where they feel safe, comfortable and valued.

Intent

Grey Seal Academy believes that:

- Every child/young person or vulnerable adult (here in after referred to as learners/colleagues) has the right to exist in a safe and caring environment
- All learners/colleagues have the right to expect an adult in a position of responsibility to listen to them when they need to express themselves
- All learners and colleagues should be valued and respected as individuals
- Vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs is unacceptable
- Bullying in any form is strictly unacceptable
- Vocal or active calls for the death of members of the British armed forces is unacceptable.
- Racist, homophobic and sexist language or behaviour is strictly unacceptable
- Any form of discrimination towards minority groups is strictly unacceptable
- Safeguarding advice and guidance, along with sign posting resources including public protection units is readily accessible through our Grey Seal Academy safeguarding guidance within our Manager and Learner handbooks
- The protection and safety of learners and colleagues is everyone's responsibility. All staff (including senior managers), partners and others have a responsibility to make the learning environment safe & secure for all

What is Safeguarding?

Whereas “Child Protection” looks at recognising abuse and neglect and acting on it - “Safeguarding” looks at keeping young people and vulnerable adults at risk safe from a much wider range of potential harm, whether from crime, other forms of abuse or from being drawn into terrorism-related activity and looks at preventative action, not just reaction.

A number of high-profile cases including the Soham murders of 2001 and the Baby P tragedy and the more recent Westminster Attacks and Manchester attacks are painful reminders of the importance of safeguarding. Although preventative measures are never infallible, there remains a pressing responsibility



to ensure that the most robust safety network possible is in place where young people and adults at risk are concerned.

Ignoring abuse is not an option

All staff must recognise this and must report any concerns for the well-being of learners and colleagues in accordance with this Policy, which has the full commitment of Grey Seal Academy's Senior Management Team.

Purpose:

This policy has been developed to:

- Ensure that all staff in contact with learners and other Grey Seal Academy colleagues take all reasonable measures to assess and minimise the risk of harm to them, and;
- Where there are concerns about the welfare including extremism and radicalisation of learners and other Grey Seal Academy colleagues, to ensure appropriate action is taken to address these concerns;
- Provide staff with guidance on procedures they should adopt in the event that they suspect a learner and/or Grey Seal Academy colleague may be experiencing or be at risk of harm.

To achieve this, Grey Seal Academy will:

- Provide a safe environment for all colleagues and learners, through thorough risk assessment, putting in place safe working practices and implementing a procedure for handling direct disclosures.
- Grey Seal Academy will consider and act on the '5 R's of Safeguarding' – The 5 R's of Safeguarding should be Recognition, Response, Record, Referral and Review.
- Have a Lead Designated Safeguarding Officer supported by a team of 'Designated Safeguarding Officers' for learner or colleague-related issues. All staff will be made aware of these roles.
- Raise issues relating to the welfare of learners or colleagues with LDSO staff and senior managers.
- Train staff who come into contact with learners appropriately and with regular updates.
- Train all staff on the 'Prevent Duty' including Chanel Awareness, British Values and where possible and available, formal qualifications.
- Keep staff and managers up to date with legislation in relation to children, young people and vulnerable adults in respect of welfare, prevent duty and well-being.
- Take appropriate action to ensure that learners and colleagues are kept safe and issues which are disclosed are reported appropriately.
- Identify and act wherever it is found that learners and or colleagues are suffering, or likely to suffer, significant harm including concerns related to being drawn into terrorism-related activity.
- Establish procedures for reporting and dealing with allegations of abuse.
- Listen to learners and colleagues, encourage an environment of mutual respect and tolerance for those with different faiths and beliefs and care for others and take action to stop any inappropriate verbal or physical abuse taking place.
- Recruit safely (staff), ensuring that through risk assessment, appropriate questions and checks are undertaken at application, interview and throughout employment.
- Ensure it meets the requirements of the Disclosure and Barring Service.
- Ensure that subcontractors have appropriate safeguarding policies and procedures and that these are checked when tendering for work with Grey Seal Academy.
- Have an effective information-sharing protocol with key partners such as employers in order to report concerns to outside agencies, where appropriate.
- Ensure appropriate legislation is checked for currency and update this policy accordingly.
- Promote the Policy and all that encompasses it to all GSA staff and other Employers, learners and other parties involved



Responsibilities

This policy has been developed to:

- Ensure that all staff in contact with learners and other Grey Seal Academy colleagues take all reasonable measures to assess and minimise the risk of harm to them, and;
- Where there are concerns about the welfare including extremism and radicalisation of learners and other Grey Seal Academy colleagues, to ensure appropriate action is taken to address these concerns;

Grey Seal Academy's Lead Designated Safeguarding Officer has the responsibility for Safeguarding. Grey Seal Academy's Senior Management Team will be involved regarding all Apprenticeship Safeguarding policy updates.

For learner/colleague-related issues, the Lead Designated Safeguarding Officer (LDSO) will take ownership in applying processes and providing support until the conclusion of the issue.

The duties of the Managing director and Senior Management Team are to ensure that:

- This policy is approved and endorsed by Grey Seal Academy Managing Director and Senior Management Team who commit to cascading it through the organisation and to key partners where appropriate
- This Policy and supporting procedures are fit-for-purpose and reviewed regularly
- There are safe recruitment practices in place within the organisation
- There is a safeguarding training and implementation plan for the organisation
- Grey Seal Academy has safe and compliant Prevent Duty procedures and accurate and timely resources available for colleagues and learners to access.
- Liaison takes place with other appropriate agencies in line with Working Together to Safeguard Children and young people
- Liaison takes place with employers to ensure that appropriate safeguards are put in place, including meeting the full requirements of the prevent duty
- The Senior Management Team remains up to date with developments in child, vulnerable adult and Prevent Duty protection issues.

The duties of a Designated Safeguarding Officer are to ensure that:

- They have received training to at least level 2, in child and vulnerable adult protection and safeguarding issues and inter-agency working and will receive refresher training at least every 12 months
- Cases of suspected abuse or allegations are referred appropriately to relevant organisations and a proper record is kept of any referral and action taken and that this is kept safely and in confidence
- Advice and support is provided to learners and colleagues on issues relating to protection from abuse
- They respond to and investigate incidences as appropriate to the nature of the complaint and liaise with external multi-agency bodies where necessary
- They are available to listen to learners receiving Grey Seal Academy services

In addition, the duties of the Lead Safeguarding officer are to ensure that:

- Senior Managers are aware of their responsibilities in regard of this policy as it relates to their particular area of the business e.g. recruitment, learning and development, commissioning services, Prevent Duty promotion of a safe environment
- Grey Seal Academy staff who work with learners are provided with appropriate safeguarding training which includes reference to Government guidance Keeping Children Safe in Education
- If appropriate, they respond to individual cases, including attending case conferences and review meetings or deploying Designated Safeguarding Officers as appropriate
- A record of all complaints or concerns is kept, even if it does not lead to a referral and stored in line with GDPR policy (During periods of LDSO absence, records will be managed by the most senior DSO, ensuring that the Managing Director is made aware



Promotion of Policy

We will promote and gain commitment to this policy through a range of methods, including, but not limited to:

To Staff:

- New staff inductions
- Undertaking professional development at least annually such as qualifications and internal training
- Read and review this policy regularly, at least annually as part of professional development activities
- The LDSO will update and train staff on any changes to this policy as they are made
- Awareness raising through regular discussions including making safeguarding a standard agenda item in meetings
- Share current affairs, topics and events that might form useful discussion with Learners

To Learners:

- Making the subject part of programme inductions and reference resources such as the Learner induction and welfare information
 - Deliver learning through direct and embedded training on topics of
 - Safeguarding,
 - British Values,
 - Prevent,
 - Equality,
 - Safety
 - Health and wellbeing (including topics of sexual abuse)
 - Online safety
- By reviewing awareness and understanding during progress reviews

To Employers

- Client Relationship Manager discusses with employers during initial engagement stages
- The employer is sent programme guides which includes details of relevant policies and processes, including safeguarding and prevent procedures for disclosures
- Checking on learner welfare with the employer during progress reviews and when concerns are raised or otherwise noticed
- By reviewing awareness and understanding during progress reviews (Line manager present)
- Signposted to the policy via the Training Agreement (Schedule 2) and the policy is publicly available on the organisation's website www.greyseal.co.uk

Dealing with Allegations of Abuse

In all cases where there are allegations of abuse, it is vital that these are dealt with fairly, quickly and consistently. There are four main strands to be considered:

- An investigation of a possible criminal offence by the police
- Involvement of local police channel coordinator, designated officer and local prevent leads concerning radicalisation and extremism concerns
- Involvement of social services
- Investigation by Grey Seal Academy and/or an employer and consideration of any disciplinary action on staff or learners



Allegations of Abuse against Grey Seal Academy Staff

Allegations of abuse, or concerns raised against members of Grey Seal Academy staff, will always be treated seriously. The allegation must always be referred to a Designated Safeguarding Officer who will follow the safeguarding procedure in the same way as for other safeguarding allegations.

The Designated Safeguarding Officer will take the appropriate steps to ensure the safety of the learner/colleague, and any others who may be at risk. The Designated Safeguarding Officer will also inform the Lead Designated Safeguarding Officer and will escalate to Senior Management stakeholders, including the Managing Director in order that Grey Seal Academy procedures may be followed, and a disciplinary investigation is carried out. If the allegation or concern is against a Designated Safeguarding Officer, it should be reported directly to the Lead Designated Safeguarding Officer.

If the allegation or concern is against the LDSO, it should be reported to Grey Seal Academy's Managing Director. Where there is a complaint against a member of staff there may also be criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services. Actions should be taken both to protect the learner/colleague and the accused member of staff. These may include ensuring that the member of staff is not placed in a vulnerable situation while investigations take place.

Actions may include:

- Giving the staff member leave of absence on full pay
- Suspending them
- Ensuring that they are not working alone with learners

Information Sharing

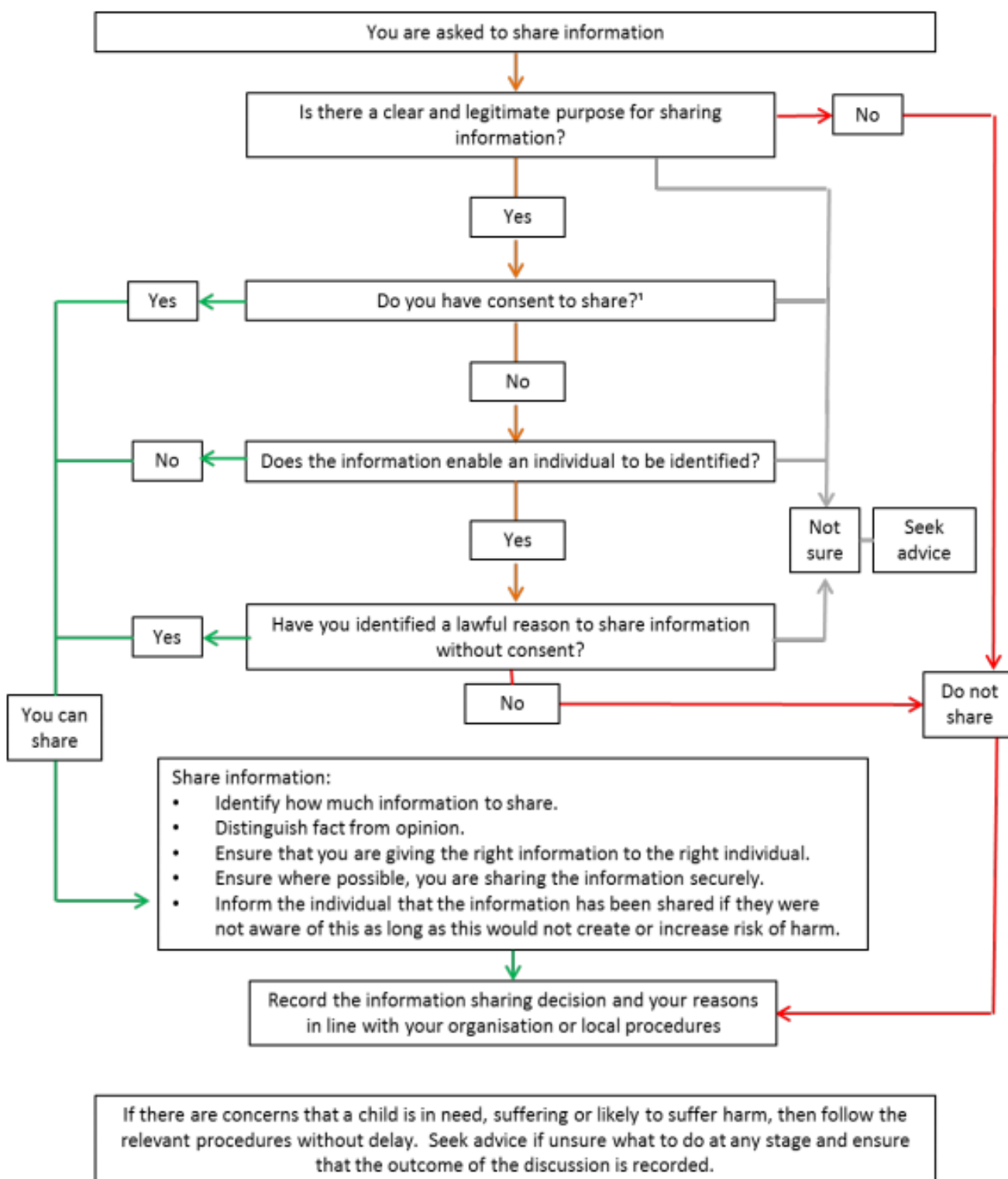
Grey Seal Academy is committed to sharing information for the purposes of safeguarding and promoting the welfare of children and young people in line with Working Together (2016) and with respect for The Data Protection Act (2018). Any decision to break confidentiality should always be preceded by informing the learner of what is about to happen and the reason for the decision. There will be no breach of confidence if the person to whom a duty of confidence is owed consents to the disclosure. Staff should, in the first instance, seek the consent from the learner if considering sharing information with other agencies. It is therefore essential that members of staff understand what is meant by the above and for that reason do not promise absolute confidentiality to the learner.

The following flow chart taken from the guidance at the hyperlink below gives further information on the sharing of information

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>



Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time



IT & Systems

Grey Seal Academy IT policy aims to safeguard all colleagues operating on our internal networks against the risks associated with radicalisation and safeguarding in general, this further extends to Grey Seal Academy colleagues conduct in using our IT systems. Grey Seal Academy anti-virus / malware software and profile control, ensure no unauthorised or unsafe software may be downloaded that may breach our Safe Use of IT policy.

Grey Seal Academy employed a Managed IT Support Service which operates additional security software on emails. This ensures no unsafe emails are allowed to pass into our systems that may yield risks from such as Malware, Spyware and other types of risk that ensures sensitive information such as Learner information is secured.

Grey Seal Academy also maintain certification under the Cyber Essentials and Cyber Essentials Plus Scheme which is retested / accredited annually.

Lone Working

Where the conditions of service delivery or its associated tasks require Grey Seal Academy staff to work alone, both the individual staff member and their Line Manager have a duty to assess and reduce the risks which lone working presents.

Lone working refers to situations where staff in the course of their duties work alone or are physically isolated from colleagues and without access to immediate assistance. This last situation may also arise where there are other staff in the building but the nature of the building itself may essentially create isolated areas.

Grey Seal Academy has implemented a Lone Working Policy which all existing and new colleagues receive training on, as part of Grey Seal Academy's induction and CPD activity.

Out of Hours Contact

Grey Seal Academy recognises that safeguarding DSO support could be required during out of office hours (9am- 5.30pm). Should a colleague or learner require safeguarding support and guidance, please contact our LDSO on 07477 808337 or MD 07463 803297.

The safeguarding support number will always be turned on and is managed between the Designated Safeguarding Officers, ensuring support is always accessible.

Social Media

Grey Seal Academy sometimes uses social media in our work and we recognise that colleagues, learners and partners who are involved, have a responsibility towards the using and monitoring of their social media platforms. Social media is intended to be used as effective information, advice and guidance resource, further enabling our learner's development in their personal development, behavior and welfare. Any content which raises a safeguarding concern must be reported to the Lead Designated Safeguarding Officer in line with the reporting processes on the previous pages.

Monitoring & Review

The (LDSO) is responsible for implementing and monitoring the Apprenticeships Safeguarding Policy. The number of learner/ colleague protection cases will be reviewed annually by the LDSO. Reports from monitoring and review activities will be reviewed by the LDSO and presented to Grey Seal Academy's, Senior Leadership Team and Managing Director on an annual basis

This Policy will be reviewed annually by Grey Seal Academy's LDSO. All review changes will be approved by the Senior Management Team and Managing Director or within four weeks of a review of any serious learner/colleague protection incident.



Access to policy documentation, advice and support

This Policy is made available to all delivery staff, Learners, Employers and other partners in formats appropriate to the various audiences e.g. On our website and Intranet.

Additional support is provided to Apprentices in the form of:

- Regular contact from their Trainer
- Tripartite reviews at least every 12 weeks
- Subjects embedded in their ongoing training
- Having contact details for their Trainer and Safeguarding Officer to use as needed (Provided through induction, emails, e-portfolio information and referenced in the available policy)

Grey Seal Academy Trainers will build a relationship with their Learners that enables them to learn their normal behaviours. This is important as a sudden change in this behaviour may indicate a support need. Any Grey Seal Academy Staff that identify a concern or potential concern should talk to their immediate Line manager or DSO as soon as it is practical to do so.

Children in Need and Specific Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues and Grey Seal Academy Designated Safeguarding Officers will liaise with appropriate external agencies. Issues that may arise that Grey Seal Academy staff should be aware of and look out for are:

- Mental Health Problems
- Domestic Violence
- Long Term Absence (Fabricated or induced illness)
- Faith Abuse
- Gangs and Youth Violence
- Gender Based Violence Including Violence Against Women and Girls (VAWG)
- Bullying (including Cyberbullying)
- Female Genital Mutilation (FGM)
- E-Safety
- Child Sex Exploitation (CSE)
- Forced Marriage
- Teenage Pregnancy
- Teenage Relationship Abuse
- Self-Harm or Suicidal Thoughts
- Radicalisation, Extremism and Terrorism
- Risk Taking Behaviour
- Drug or Alcohol Abuse
- Sexting
- Trafficking, Exploitation and Modern Slavery
- Living with a family member's addiction to Drugs, Alcohol or behaviour such as gambling.
- Homelessness
- Poor parenting
- Socalled honour-based violence

This list is not exhaustive.



Confidentiality Agreement

Grey Seal Academy will operate on the premise that all information imparted to a member of staff will be treated in confidence. Confidentiality is a key issue in the lives of learners/colleagues. They may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must become familiar with Grey Seal Academy confidentiality guidelines. Staff must not make promises on confidentiality they may be unable to keep.

Furthermore, staff should always make a learner/colleague fully aware of any situation where confidentiality must not be maintained as in a case of child and vulnerable adult protection. Learners/colleagues may disclose information that is difficult for the member of staff to deal with without further advice/support. In this case the learner/colleagues should be told that the situation will be discussed with another colleague with a specialty in that area, but confidentiality will be maintained if possible.

Through our our Safeguarding process, there may be need to make records. These will never be a transcript and held securely. Any records made are strictly for the purpose supporting an extended safeguarding process, should it be needed.

Safeguarding Welfare (Potential and emerging needs)

It is recognised that Learners who do not make a disclosure may still need a form of safeguarding, for example, a Learner suffers with anxiety which may affect their wellbeing, learning programme or both; this process will help us to ensure we understand what the triggers for this are and how we can manage their wellbeing so that they are able to enjoy their time on programme and make good progress with their learning.

Any Grey Seal Academy member of staff may complete a "Potential and emerging needs notification" form at any time and submit this to the Designated Safeguarding Officer i.e. via email to safeguarding@greysealacademy.co.uk. This form can be found in the Teams folder under "Forms" and in the Safeguarding Policy folder (Folder 3) on our Share Point.

Upon receipt, the DSO will review the contents and assuming some form of ongoing monitoring is required, this will be added to the Safeguarding Register to ensure ongoing monitoring and follow up, including an assessment of whether the need might include any aspect of "Prevent". This may include:

- Discussion with the Trainer to find out more, provide advice and agree timely follow up and actions
- Direct discussion by DSO with Learner and Employer where appropriate to ensure support is in place as needed by the individual
- Regular updates of information on the register to record monitoring and follow ups

The Safeguarding Process (Disclosure)

Grey Seal Academy, while many of it is Learners are adult Learners, some will also be considered children under the law and may require special considerations in the event of a Safeguarding concern i.e.

Child = Aged 16 – 17

Adult = Aged 18+

- Stage 1 – An individual discussed their concerns with a Grey Seal Academy Staff Member
 Stage 2 – a DSO will speak directly to the individual with the concern to assess support needs
 Stage 3 – A Safeguarding concern is referred to an external source of support i.e.
- Local Child Social Care Duty team (Where the disclosure concerns a child)
 - Designated Officer of Local Authority (LADO)
 - Police

It is not a given that a Safeguarding disclosure will progress through all 3 stages. Support will be defined on a case by case basis, using processes set out below.



When a Learner makes a disclosure to a Grey Seal Academy Staff member

If someone informs you directly that they are concerned about an individual's behaviour towards them; this is known as a disclosure.

1.1. Staff member receiving the concern should:

- React calmly so as not to frighten the learner/colleague
- Demonstrate that you are taking what the learner/colleague says seriously
- Avoid leading the learner/colleague and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said, seen or heard
- Re-assure the learner/colleague but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments.

Tell them the following:

- They are not to blame and that they are right to tell
- Explain that you will have to inform your Designated Safeguarding Officer (DSO)
- If the person is a child, explain that their parent / carer may be informed unless there is reason to suspect doing so will place them in greater harm

1.2 If the conversation yields a Safeguarding Disclosure

See points A-D in "what to do next" below

When a Grey Seal Academy Staff Member identifies a potential / actual concern

2.1 Hold a discussion with the individual concerned

- Explain to the individual what you have noticed.
- Explain that they do not have to tell you anything they don't want to, however, if they are at risk of any sort of harm, you may need to involve others in order to get them the help they need.
- Ask them how they are, do they need help and let them talk uninterrupted.
- Avoid leading the learner/colleague and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said, seen or heard
- Re-assure the learner/colleague but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments

2.2 If the conversation yields a Safeguarding Disclosure

See points A-D in "what to do next" below

2.3 If the conversation does not yield a Safeguarding Disclosure

Let them know that they can always seek help via Grey Seal Academy and any of their Staff at any time. This may also lead to the identification of a **potential / emerging need** (see earlier section on this)

If you are still unsure as to what the right action might be, always inform your DSO, even if this is informally for advice.

When an Employer reports a concern to Grey Seal Academy

3.1 Staff member receiving the concern should:

- Gather information
- Inform the employer that you will need to involve others, namely the DSO and any other agencies the DSO decides is appropriate to the situation e.g. Local Protective Services, Police and / or Prevent Officers.
- Complete a **stage 1** form and pass this to the DSO

3.2 DSO should discuss the Employers disclosure with the individual concerned

DSO should follow A-D in "what to do next" below



What to do next

<p>A. Identify if they are at immediate risk of harm. The person receiving the disclosure must:</p> <ul style="list-style-type: none"> You must ensure the immediate safety of the learner/colleague Contact the Grey Seal Academy DSO if the person receiving the disclosure is not a DSO If the learner/colleague is in imminent risk of significant harm telephone for an ambulance and Police inform them of concerns and ensure that they are aware that this is a safeguarding issue A record of the conversation is important but do not take notes while you are speaking to the person, this may put them off or distract you from really listening, do this afterwards on a Stage 1 report and pass this as soon as possible to the DSO via secure method i.e., direct email along with verbal discussion. (Record details such as Names of all involved, date, time, and venue/location – record the conversation/observations as accurately as possible)
<p>B. The LDSO must, on receiving notification of the disclosure where there is immediate risk of harm</p> <ul style="list-style-type: none"> Contact the individual straight away and gather further information (Stage 2) Contact Local Child Social Care Duty team, Designated Officer of Local Authority (LADO) immediately or failing that, the Police, if safety/ welfare is of immediate concern, refer all concerns/ allegations/disclosures that may or do constitute a criminal offence to the Police (Stage 3) Update the Safeguarding Log (Held securely in Grey Seal Academy IT Systems) which includes noting if the concern is also a Prevent concern If applicable and appropriate, parents/carers will need to be informed as soon as possible, but this must be from an appropriate source (children's social care/police) The DSO should then follow up so far as is reasonably practical to ensure the individual receives the help they need to ensure their safety and wellbeing and that their training might continue.
<p>C. Where there is no apparent immediate risk of harm or abuse</p> <ul style="list-style-type: none"> The person receiving the disclosure should document what they have heard / know on the Stage 1 report and forward this to the DSO as soon as possible It is also ideal for the person receiving the disclosure to discuss it verbally with the LDSO or DSO
<p>D. Where the issue is a concern rather than an allegation of abuse</p> <ul style="list-style-type: none"> An example of a concern might be a mental health related difficulty, or a recent event that has caused a difficult time for the individual, it might be appropriate to make the DSO aware of it to ensure the Learner gets the help and advice they need. The concern may be disclosed by the individual or noted by Grey Seal staff e.g., noticing signs of depression or worry. In these instances, the person noting the concern should discuss the issue with the individual in the normal fashion and then follow this up by completing a potential/emerging need notification form for the DSO The person reporting the concern should also verbally discuss the concern to gain guidance on support, this might mean <ul style="list-style-type: none"> Where the person reporting the concern is the Learner's trainer, gaining advice from the DSO that they then pass on to the Learner, agreeing actions / review intervals etc. The DSO would record this on the safeguarding log and follow this up regularly with the trainer to monitor the individual's wellbeing for improvement or further signs of risk. Where the DSO decides that further support is needed, they may contact the individual and have a further discussion. They would record this on the safeguarding log in case of any onward referral, present or future if required.

NB. The above are scenarios, but they are not exhaustive.

We will have due regard for any disclosures involving those under the age of 18 and circumstances may require a referral to child protection services and involvement of carers/parents as well as the Employer



How we Safeguard an Apprentice aged 16-17

We must be particularly aware that there is increased risk to 16–17-year-olds, because they are close to being an adult but may not be aware of the risks e.g. being around alcohol, smoking and online activity. They may be particularly vulnerable to the risks posed by online activity and sexual harm. They may be convinced that they are grown up, but in reality, many are not because they lack the experience to recognise potentially dangerous situations and/or people.

A young person will be identified during the enrolment process which will trigger additional checks with the employer through the skill scan procedure. E.g. working environment is suitable and safe for a young person and appropriate safeguards are in place should they be identified. The results of which will be documented on the Training Plan for the individual which is signed and agreed to by the employer.

In all cases we expect our employees to adhere to the code of practice for adults working with children and young people.

AND

**We will uphold a similar code for our expectations of the behaviour of children and young people.
These codes are at the end of this document**

Examples of risk:

Sharing Photos

It is illegal in the UK to send or post certain images online (a girl naked from the waist up or showing genitalia; a boy showing genitalia) if the person in the photo is under 18. This applies even if the person in the photo and the person receiving the photo both consent. It is dangerous to post or send this type of picture because images will be online forever and posting them makes somebody more vulnerable to their image being misused in the future. People do this for various reasons, for example as an act of revenge after the end of a relationship.

Being misled by fake emails or websites

Financial fraud is a huge online problem. Young Apprentices may respond to fake emails by sending personal bank or credit card details and find their money disappears. Or they purchase things online from fake websites which take the student's money but never provide the goods. Typically, 16 and 17-year-old students may believe they are good at using online services and never imagine they could be duped by fake information.

Grey Seal Academy's Responsibilities

Even when incidents happen outside of Apprentices work and learning, we have a responsibility to take action to protect children and young people.

If a young person tells us they've been involved in sexting

Sending and receiving sexual messages through technology such as a phone, app, email or webcam. It is an offence to make, distribute, possess or show any indecent images of anyone aged under 18, even if the content was created with the consent of that young person.

We will take steps to get an explicit image or video removed if it's been posted online. To do this we will:
Gather information about the content and its location

- Report the image to the site or network hosting it.
- Contact the [Internet Watch Foundation \(IWF\)](#) and,
- Make a report with their online tool [here](#) so they can support the removal of this content.

Sexting will be considered a Safeguarding Issue, and the Safeguarding process will be triggered.
See Page 12.

See our separate sexting policy at the end of this document



If a young person tells us, or we suspect that they have experienced workplace bullying or any other inappropriate behaviour from a peer or adult within their organisation.

We will report this to the Employer and expect their co-operation in ensuring an issue is not allowed to continue. We will expect to gain quick feedback on the resolution of this issue.

This could include:

- Bullying
- Inappropriate physical contact
- Inappropriate “banter”
- Inappropriate online conduct or contact

This will be considered an emerging need, since it left unchecked could escalate into more serious safeguarding issues e.g. poor mental health, withdrawal from learning etc. We will provide appropriate support, advice and signposting of additional support services.

A child or young person tells us that they are experiencing exploitation

Examples of this are well known e.g. County Lines and trafficking

This will be considered a safeguarding disclosure and we will follow our safeguarding policy. For someone under 18, this will involve making a referral to local authority services and the police.

For further information: <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>

A child or young person tells us that they have been in contact with someone grooming them with extremist ideas in an attempt to radicalise them

This will be considered a safeguarding disclosure and we will follow our safeguarding policy as well as making a Prevent referral. See next section. (Similarly for any adult.)

For further advice there is the national police Prevent advice line on 0800 011 3764.

Remember, in an emergency always ring 999.

Behaviours that breach our behaviours code of conduct

We will always take appropriate action as detailed in these codes of conduct e.g.

- Children and young people – Staged warning process
- Our staff – suspend them temporarily from restricted activities or other contact with children and young people while we follow our disciplinary policy

When a 16-17 year old requires a break in learning

We will take steps to ensure we fully understand the reasons, since these may indicate a support need. E.g. asking detailed questions about the reason for the break and if agreed, monitoring the return to learning carefully to ensure we can support any ongoing needs.

If it is felt that this is likely to represent a potential or emerging need. This will be entered onto our central welfare register so the DSO/LDSO can monitor their ongoing wellbeing until there are no further concerns. The DSO/LDSO will ensure the Apprentices return to learning is carefully planned with the employer to ensure their ongoing wellbeing. This will be done through a re-engagement tripartite progress review involving the Apprentice’s Trainer, Line Manager and the Apprentice themselves. Once completed, it will be checked by the DSO/LDSO ensuring any ongoing needs are appropriately met.

In all cases

The above are examples but not exhaustive. We must have due regard for the support children and young people might need. We will:

- Ensure they understand that they can talk to us
- Let them know there are additional sources of support e.g. Childline: <https://www.childline.org.uk/get-support/contacting-childline/>



When the LSDO considers that a Prevent Referral is required.

The LSDO will:

- Contact the regional Prevent Co-ordinator for the geographic area of the Learner
- Complete Prevent National Referral Form
- Forward Prevent National Referral Form as directed by Regional Prevent Co-ordinator.
- Co-operate with Police and Local Authority as required

Regional Prevent contacts can be found at the link below:

[Regional further education \(FE\) and higher education \(HE\) Prevent co-ordinators - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Policy Details; Definitions

A child or young person

The legislation specifically refers to any person who is under the age of 18 years.

Adult at risk aged 18 or over

An adult at risk is defined by the Care and Support Statutory Guidance 2015 (issued under The Care Act 2014):

- Who is or may be in need of community care services by reason of mental or other disability, age or illness?
- Who is or may be unable to take care of themselves or unable to protect self against significant harm or serious exploitation?

Categories of adults at risk of abuse, includes:

- Physical abuse
- Domestic abuse
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Organisational abuse
- Modern slavery
- Neglect or acts of omissions
- Discriminatory abuse
- Self-neglect

A person's vulnerability will depend on their circumstances and environment, and each case must be considered individually.

Note:

However, that people are not vulnerable adults just because of any learning difficulty or learning disability. They will be defined as vulnerable adults when they receive health, social care or other services, or activities specifically for those with learning difficulties and / or disabilities.

Significant Harm

Significant harm is the threshold that provides for intervention by other agencies.

British Values

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"; institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010.

**Extremism**

The government has defined extremism in the Prevent Duty as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs."

This also includes calls for the death of members of the British armed forces.

Values

Principles or standards of behaviours; one's judgement of what is important in life.

Terrorism

Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.

Radicalisation

The process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Ideology

An ideology is a set of beliefs.

Citizen

A legally recognised subject or national of a state or commonwealth, either native or naturalised.

Citizen Education

Enables people to learn about their rights and responsibilities, and to understand how society works. It prepares them for dealing with the challenges they face in life. Through citizenship education, young people are encouraged to play an active part in the democratic process, thereby becoming more effective members of society. Effective citizenship education increases confidence, self-esteem and motivation for learning.

Religion

Religion can be explained as a set of beliefs concerning the cause, nature, and purpose of the universe, especially when considered as the creation of a superhuman agency or agencies, usually involving devotional and ritual observances, and often containing a moral code governing the conduct of human affairs.

Belief

Indicates an acceptance that something exists or is true, especially one without proof, and represents trust, faith, or confidence in (someone or something).

Faith

Indicates strong belief in the doctrines of a religion, based on spiritual conviction rather than proof.

Democracy

The term democracy is a Greek word which means 'Government by the people' and this entitles citizens of the UK (minus a few exceptions) to have the right to vote if you are aged 18 or over.



Child Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or a young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sexual abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- Can still be abuse even if the sexual activity appears consensual;
- Can include both contact (penetrative and non-penetrative acts) and non- contact sexual activity;
- Can take place in person or via technology, or a combination of both
- Can involve force and / or enticement- based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- May occur without child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example)
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time;
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. This power imbalance can include gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

What is meant by abuse/ neglect?

Neglect is the persistent failure to meet a young person's or vulnerable adult's basic physical and / or psychological needs, likely to result in the serious impairment of their health or development. This includes cold, starvation or any aspect of care which could result in significant impairment of an individual's well-being or development.

For example:

- Failure to keep a person clean, warm and healthy
- Failure to provide reasonable care
- Failure to give prescribed medication
- Failure to provide adequate supervision
- Failure to give privacy and dignity of care
- Failure to give access to appropriate medical care
- Failure to provide nourishment

Note:

This is not an exhaustive list but guidance as to what may suggest abuse. The Police and Social Services have prime responsibility under the Children's Act 2004 and this places the duty of care on local authorities to take action to protect vulnerable persons in particular circumstances and it gives powers to the police enabling them to take action to protect. Other examples include failing to protect from physical harm or failure to provide appropriate medical care.



Physical Abuse:

Physical injury or unreasonable physical constraint to an individual where there is definite knowledge or reasonable suspicion that the injury was inflicted or knowingly not prevented.

For example:

- Assault
- Slapping, scratching, hitting, burning/ scalding
- Misuse of medication, deliberate poisoning
- Suffocation, pushing, rough handling.
- Shaking, force feeding and unnecessary restraint
- Potential indicators of physical abuse may include:
- Sprains, fractures, broken bones and burns
- Rope or strap marks
- Bruises of different colours suggesting they were sustained over a period of time
- Hair and tooth loss
- Internal injuries
- Bleeding from bodily orifices
- Delay between on the onset injury and seeking medical care.

Financial/Material Abuse

Misappropriation of an individual's funds, and/or any other actions that are against their best interests.

For example:

- Theft of money, possessions, property or other material goods
- Misuse of money
- Fraud or extortion of material assets
- Disparity between a person's living conditions and their financial resources
- Unusual and extraordinary interest and involvement by a third party in the vulnerable individuals assets
- Pressure in connection with wills

Psychological/Emotional Abuse

Actions that are not of a physical nature but severely affect the psychological well-being of the individual for example conveying to them that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of the other person. Some level of emotional abuse is involved in all types of ill treatment of a young person or vulnerable adult, although it may also occur alone.

Other examples include:

- Humiliation or ridicule.
- Deliberately ignoring an individual.
- Threat or punishment or exclusion.
- Verbal assault including bullying

Potential indicators of psychological / emotional abuse include:

- Stress related conditions, including raised blood pressure
- Significant weight gain or loss not attribute to other causes
- Low self esteem
- Isolation
- Problems sleeping
- Depression or confusion
- Cowering in presence of abuser
- Non-responsive, upset or agitated

Where young learners or adults are working in a class/group, colleagues are charged with monitoring learners' behaviour and are asked to act promptly on any suspicion or report of bullying or harassment.



Sexual Abuse:

Sexual abuse involves forcing or enticing a young person or vulnerable adult to take part in sexual activities to which they may not have given consent or may not fully comprehend. The activities may involve physical contact or non-penetrative acts including non-contact activities such as the production of pornographic material or watching sexual activities or encouraging a young person or vulnerable adult to behave in a sexually inappropriate way.

For example:

Indecent exposure, rape, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or pressured into consenting.

Where abuse occurs against an apprentice, by an apprentice Grey Seal Academy will identify both parties as individuals in need of Safeguarding Support and conduct processes to this end irrespective of any other disciplinary or protective actions that may be required.

Sexting:

Sending and receiving sexual messages through technology such as a phone, app, email or webcam. It is an offence to make, distribute, possess or show any indecent images of anyone aged under 18, even if the content was created with the consent of that young person. The law is contained in section 1 Protection of Children Act 1978.

Examples include:

- a child (under 18) sharing a sexual image with their peer (also under 18);
- a child (under 18) sharing a sexual image created by another child with a peer or an adult;
- a child (under 18) in possession of a sexual image created by a child (under 18).

“Indecent” means, for example:

- naked pictures;
- topless pictures of a girl;
- pictures of genitals;
- sex acts including masturbation; and
- sexual pictures in underwear.

Discriminatory Abuse:

Is abuse that may take the form of slurs, harassment and maltreatment because of someone's race, gender, disability, age, faith, culture or sexual orientation.

It may also involve providing different care or support to a vulnerable adult based on any difference or disability they may have. The individual may be subject to actions or threats which result in harm or them feeling frightened.

Potential indicators of discriminatory abuse may include:

- Tendency to withdrawal, isolation or depression.
- Fearfulness
- Being used as a scapegoat
- Being refused access to services or being excluded inappropriately by others
- Loss of self-esteem
- Resistance or refusal to access services that are required to meet the vulnerable individuals needs
- Expressions of anger or frustration by victim
- Weight loss

Modern Slavery:

Slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.



Cyberbullying:

Cyber bullying is bullying that takes place by one person or a group of people using electronic technology. Electronic technology includes devices and equipment such as mobile phones, computers, and android and tablet devices. Additionally, communication tools including social media sites, text messages, social chat applications and websites.

For example:

- Threatening, teasing or embarrassing text messages
- Rumour spreading sent by email or posted on social media networking sites
- Uploading and posting embarrassing pictures and videos
- Creation of fake profiles

Potential indicators of cyberbullying may include:

- Use of alcohol and drugs
- Fearfulness
- Experiencing in-person bullying
- Be unwilling to attend appointments or planned activity o Loss of self-esteem
- Expressions and anger or frustration by victim o
- Problems sleeping

Institutional/Organisational Abuse:

May take the form of systems and routines that neglect or prevent an individual receiving appropriate care. The convenience and needs of the staff are prioritised above those of the vulnerable individual.

Poor services are either promoted or ignored. This can happen in any setting where formal care is provided.

Potential indicators of institutional abuse may include:

- Lack of person-centred care planning or a ritualised care routine
- No flexibility in bedtime routine and / or deliberate waking
- People left on the commode or toilet for long periods of time
- Inappropriate care of possessions, clothing and living area
- Lack of personal clothes and belongings
- Inappropriate use of medical procedures
- People referred to or spoken to with disrespect
- Lack of choice in food or menus or menu planning
- Inappropriate use of power or control



Radicalised or extremist behaviour:

While not always easy to detect, signs may include:

- A sudden / unexplained change in behaviour
- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with students who are different
- Becoming abusive to students who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups
- Sharing of extremist material
- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

Grey Seal Academy encourages its Staff, Learners and Employers to discuss any behaviour they may be concerned about so that the best advice and support can be provided.



Statutory requirements summary further advice and information

- The Care Act 2014
- Children (Protection at Work) (No2) Regulations 2000
- Children's Act 1989 (Amendment Act 2004)
- Counter-Terrorism & Security Act 2015
- Criminal Justice Act 1988
- Data Protection Act 2018
- Education Act 2011
- Education and Inspections Act 2006
- Employment Act 2008
- Equality Act 2010
- Freedom of Information Act 2000
- Human Rights Act 1998
- Learning and Skills Act 2000
- Protection from Harassment Act 1997
- Protection of Children Act 1978
- Safeguarding Vulnerable Groups Act 2006
- Special Educational Needs and Disability Act 2001 (SENDA)
- Working Together to Safeguard Children Guidance (2018)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- The Education Inspection Framework and guidance relating to Safeguarding
<https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills/inspecting-safeguarding-in-early-years-education-and-skills>
- Sexual Offences Act 2003



Behaviour code for adults working with children and young people

The purpose and scope of behaviour code

This behaviour code outlines the conduct that Grey Seal Academy expects from all our staff which we define as anyone who is undertaking duties for the organisation.

The behaviour code is there to help us protect children and young people from abuse. It has been informed by the views of children and young people.

Grey Seal Academy is responsible for making sure everyone taking part in our activities has seen, understood and agreed to follow the behaviour code, and that they understand the consequences of inappropriate behaviour.

The role of staff

In your role at Grey Seal Academy, you are acting in a position of trust and authority and have a duty of care towards the children and young people we work with. You are likely to be seen as a role model by young people and are expected to act appropriately.

We expect people who take part in our services to display appropriate behaviour at all times. This includes behaviour that takes place outside our organisation and behaviour that takes place online.

Responsibility of staff

You are responsible for:

- prioritising the welfare of children and young people
- providing a safe environment for children and young people
 - ensuring equipment is used safely and for its intended purpose
 - having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.
- following our values, policies and procedures, including our policies and procedures for safeguarding and child protection, whistleblowing and online safety
- staying within the law at all times
- modelling good behaviour for children and young people to follow
- challenging all inappropriate behaviour and reporting any breaches of the behaviour code to your Trainer or Designated Safeguarding Officers named at the start of this document
- reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures, this includes inappropriate behaviour displayed by an adult or child and directed at anybody of any age.

Respecting children and young people

You should:

- listen to and respect children at all times
- value and take children's contributions seriously, actively involving them in planning activities wherever possible
- respect a young person's right to personal privacy as far as possible
 - if you need to break confidentiality in order to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity.



Diversity and inclusion

You should:

- treat children and young people fairly and without prejudice or discrimination
- understand that children and young people are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Appropriate relationships

You should:

- promote relationships that are based on openness, honesty, trust and respect
- avoid showing favouritism
- be patient with others
- exercise caution when you are discussing sensitive issues with children or young people
- ensure your contact with children and young people is appropriate and relevant to the nature of the activity you are involved in
- ensure that whenever possible, there is more than one adult present during activities with children and young people:
 - if a situation arises where you are alone with a child or young person, ensure that you are within sight or can be heard by other adults
 - if a child specifically asks for or needs some individual time with you,
- ensure other staff know where you and the child are
- only provide personal care in an emergency and make sure there is more than one adult present if possible:
- unless it has been agreed that the provision of personal care is part of your role and you have been trained to do this safely

Inappropriate behaviour

When working with children and young people, you must not:

- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances
- develop inappropriate relationships with children and young people
- make inappropriate promises to children and young people
- engage in behaviour that is in any way abusive, including having any form of sexual contact with a child or young person
- let children and young people have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening or intrusive
- patronise or belittle children and young people
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people.

Upholding this behaviour code

If you have behaved inappropriately, you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you might be dismissed from Grey Seal Academy. We might also make a report to statutory agencies such as the police and/or the local authority child protection services.

If you become aware of any breaches of this code, you must report them to your Trainer or Designated Safeguarding Officers named at the start of this document. If necessary, you should follow our whistleblowing procedure and safeguarding procedures.



Behaviour code for children and young people

Why we have a behaviour code

This behaviour code is there to make sure everyone who takes part in Grey Seal Academy's activities knows what is expected of them and feels safe, respected and valued.

Grey Seal Academy must make sure that everyone taking part in our activities has seen, understood and agreed to follow the behaviour code, and that they understand what will happen if there is inappropriate behaviour.

We expect people who take part in our services to display appropriate behaviour at all times. This includes behaviour that takes place outside our organisation and behaviour that takes place online.

This behaviour code aims to:

- identify acceptable and unacceptable behaviour
- encourage cooperation, honesty, fairness and respect
- create an environment where your self-esteem, self-respect and self-confidence will grow
- encourage you to recognise and respect the rights of others
- encourage you to take responsibility for your own behaviour
- help resolve conflicts and make it clear what will happen if you decide not to follow the code.

Dos and don'ts for children and young people

Do:

- be supportive and kind to others
- be friendly
- listen to others
- be helpful
- have good manners
- treat everyone with respect
- take responsibility for your own behaviour
- talk to your trainer or Designated Safeguarding Officer about anything that worries or concerns you
- follow this behaviour code and other rules (including the law)

Don't:

- be disrespectful to anyone else
- bully other people (online or offline)
- behave in a way that could be intimidating
- be abusive towards anyone.

[Why not print a copy of these dos and don'ts and ensure they are visible at all times!].

What happens if I do not to follow the behaviour code?

This behaviour code is part of our process for making sure everyone who takes part in our activities gets the support they need.

Minor or first-time incident

If you behave in a way that doesn't follow our behaviour code, our staff will remind you about it and ask you to change your behaviour. This gives you the chance to think and to plan how you could behave differently, with support from our staff.



Formal warning

If you continue not to follow the behaviour code after your first reminder, or if your behaviour is more serious, you may present a risk of harm to yourself and others and you will be given a formal warning by the person running your activity e.g., your Trainer.

They will make a record about what happened and inform your parents or carers and employer if it is appropriate. They will also talk with you about what happened and agree what support you need to improve your behaviour in the future.

We might also decide that further steps should be taken, such as restricting you from taking part in some activities.

Final warning

If the support we have put in place isn't helping you to change your behaviour, we might need to give you a final warning. Again, this will be recorded, and we'll inform your parents or carers and employer as appropriate.

At this point, we might need to talk with you and your parents or carers and employer about other services that might be more able to give you the support you need.

Child protection procedures

If any member of staff becomes concerned that your behaviour suggests you might be in need of protection or that you might present a risk of harm to other children and young people, they will follow our safeguarding procedures.

This might involve making a referral to the local authority. If child protection procedures are necessary, we will talk this through with you and your parents as soon as possible, unless doing so would put you in danger or interfere with a police investigation.

The role of parents, carers and employers

We see parents, carers and employers as important in encouraging positive behaviour and will involve them as appropriate.

We will always inform and involve your parents or carers and employer if you receive a formal warning about your behaviour, unless doing so would put you in danger.



Sexting policy

Sexting includes:

- being partly or completely naked, or in your underwear
- posing in a sexual position
- sending 'nudes' or 'dick pics'
- talking about sexual things you're doing or want to do
- doing sexual things on a live stream

We will follow the Recognise, Report, Record, Review process

Children and young people who are involved in a sexting incident might have:

- shared an image of themselves
- received an image from someone else
- shared an image of someone else more widely.

This may have happened with or without consent of all the people involved. And children may have been coerced or pressured into giving consent.

Sometimes a child might disclose directly that they have been involved in sexting. Or they might mention something which gives cause for concern. Other times it might be noticed that a child is behaving differently or being bullied, and the sexting might come to light when we try to find out what's going on.

Sometimes it might be an overheard a conversation between children, or see something that gives cause for concern.

Grey Seal Academy will:

Talking to a young person who has been involved in sexting

Gather information

The DSO or LDSO will talk to the young people involved, to find out what's happened, how they are feeling and what support they need, finding out as much as possible such as:

- if it's an image, video or message
- who sent it
- who is featured in it
- if there were any adults involved
- if it's on an organisational or personal device.

What to do with the image

It's best practice never to view any sexting images.

If the image is on a device belonging to your organisation, it must be isolated so that nobody else can see it. This may involve blocking the network to all users.

You should never copy, print or share sexual images of a child or young person (Childnet, 2016; UKCCIS, 2017a and 2017b).

We will only search devices if the child is at immediate risk of harm.

If the image is online we will attempt to get it removed by making a report to the site or network and/or the [Internet Watch Foundation \(IWF\)](#)

[Searching, Screening and Confiscation Advice for schools](#)



Support children and young people involved

We will involve parents and carers, unless doing so might pose a risk to their child.
We may also make a referral to a counselling service or therapeutic support. For example:

NSPCC Helpline: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/>
Child Line: <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/>

Make a child protection referral where appropriate

We will make a child protection referral if:

- the incident involves an adult
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, if they have a learning disability)
- what we know about the image(s) suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent
- the image(s) involves sexual acts and any child in the image(s) is under 13
- we have reason to believe a child or young person is at immediate risk of harm due to the sharing of the image, for example if they are presenting as suicidal or self-harming.

Where there is immediate danger, we will call the police on 999

If the sender of the content is an Apprentice at Grey Seal Academy

We will support the young person by triggering our Safeguarding Procedure

This will additionally involve a referral to the police; we will report the incident as it is an offence to make, distribute, possess, or show any indecent images of anyone aged under 18, even if the content was created with the consent of that young person.

If an indecent image of a child shows a sexual act

The Sexual Offences Act 2003 states that the police must investigate to find out whether a sexual offence has been committed and act accordingly. This applies across the UK.*

What to do if you have sent an image (Advice for children and young people)

If you’ve sent an inappropriate image and you’re worried about what might happen, there are things you can do:

Ask for the message to be deleted

Explain that you’re not comfortable with them keeping the picture and ask them to delete it.

Don’t reply to threats

Don’t reply to someone trying to threaten or blackmail you, and don’t send more photos. It can be scary, but it can help you to keep in control

Talk to someone you trust

Talking can be scary, especially if you’re being threatened. But it can also help you get support and stay in control.

Use Report Remove to get it removed from the internet

If you’re under 18 and a nude image or video has been shared online, we can help you get it removed from the internet. <https://www.iwf.org.uk/report/>

Report what’s happened

If you’re under 18 and you’re worried or being threatened, you can make a report to CEOP. Making a report isn’t confidential but it does mean that they can help to stop what’s happening.

<https://www.ceop.police.uk/Safety-Centre/>

Get help with how you’re feeling

Having a nude shared by other people or being threatened isn’t your fault. If you’re struggling to cope or you don’t know what to do, talk an organisation like ChildLine or NSPCC

*In England and Wales, the Protection of Children Act 1978 makes it an offence to take, make, show, distribute, possess (with a view to distribute) or publish an indecent photograph or pseudo-photograph of a child.

Part 11 of the Criminal Justice Act 1988 makes it an offence to possess indecent images of children (whether or not you intend to distribute them).