SAFEGUARDING – REPORTING A CONCERN PROCEDURE

Procedure Statement
At Activate Learning, we are committed to ensuring all students and apprentices feel safe, supported, and cared for, in line with our Learning Philosophy and Safeguarding and Child Protection Policy. This guide outlines the steps staff should follow to help ensure the safety of our students and outlines their responsibilities when responding to concerns about children or adults at risk.

Responsibilities
This procedure applies to everyone at Activate Learning, including staff, governors, volunteers, visitors, contractors and users of our premises.

It covers all students, whether they are on campus, work placements, online learning, apprenticeships, or in partnership with schools, and regardless of their age.

Everyone is responsible for:
- Recognising safeguarding concerns
- Responding appropriately
- Recording concerns accurately
- Referring concerns to the Safeguarding Team, promptly

If ever unsure, refer to **Appendix 2** for guidance on safeguarding thresholds or contact the Safeguarding Team for advice.

Recognising
Some students may face barriers to disclosing abuse or harm due to factors such as their age, vulnerability, disability, communication difficulties, or past trauma. Therefore, anyone with concerns about a student's safety or well-being should take immediate action rather than waiting for a verbal disclosure.

Indicators of potential harm include, but are not limited to:
- **Behavioural changes:** Withdrawal, aggression, isolation, emotional outbursts, or fearfulness
- **Physical signs:** Unexplained injuries, poor self-care or hygiene, signs of tiredness or hunger, changes in appearance
- **Emotional indicators:** Low self-esteem, talk of self-harm or suicide, or hopelessness
- **Social concerns:** Inappropriate sexualised behaviour, risk taking behaviour, poor social skills or withdrawal from friends/activities they previously enjoyed.
- **Online concerns:** Increased or secretive online activity, accessing or spreading harmful content online
- **Other signs:** Absences from education, or possession of unexplained items like multiple phones or money, misuse of drugs or alcohol, possession of weapons, going missing.

All staff must be ready to respond appropriately if a student discloses harm. It is not your job to investigate, but to respond appropriately, record, and promptly refer the concern to the Safeguarding Team.

Responding
If a student confides in you, here are key dos and don'ts:

Do	Don't
Listen carefully and give your full attention	Interrupt, rush, or become distracted
Use open and neutral body language	React with shock, disgust or panic
Reassure the student they did the right thing in	Promise confidentially or make promises you

telling somebody	cannot keep
Take accurate notes using the student's words	Make assumptions or use your own words to describe events
Accept what they are saying, take it seriously and convey belief	Investigate or assume it has already been reported
Use a body map if mapping injuries	Take photographs or receive / view indecent images of children

Sometimes it may be appropriate to ask clarifying questions to better understand the context of a disclosure. It is important to use open-ended questions rather than leading or closed questions.

Appropriate Questions	Inappropriate Questions
Where, when and/or how did this happen?	Did you feel sad when that happened?
Could you describe what happened?	Did they hurt you?
Who was there?	Things haven't been very good at home recently, have they?
Can you tell me more about that?	They aren't very nice, are they?
Is there anything else you'd like to talk about?	Why didn't you tell anybody before?
Is there anything else I can help with?	Are you sure this is true?

Remember, you must inform the student that you cannot keep the information confidential and must report it for their safety. You should reassure them that they will be kept informed about and supported through the next steps.

Referring
If you're worried about a student's safety or wellbeing, contact the Safeguarding Team immediately:
- **Call:** 01865 550401
- **Email:** safe@activatelearning.ac.uk
- **Submit a Record of Concern form** via SharePoint (Link to record of concern form)
- **Speak to a Safeguarding Adviser** (See **Appendix 1** for team contacts by campus)

Recording
IMPORTANT - *If you've referred in person or via phone call, please follow up with a written record sent to the Designated Safeguarding Adviser. Use email or safeguarding record of concern form, but do not use ProMonitor for confidentiality reasons.*

Next Steps
The Safeguarding Team may:
- Meet with the referrer and student to further explore the concerns
- Refer the case to the police or social services
- Contact specialist support (e.g., mental health services)
- Speak with the student's guardians, if safe to do so
- Refer the student to internal support like counselling or coaching
- Update the student's support plan or create a Safeguarding Personal Risk Assessment (PRA)
- Offer the student ongoing support

Out of Hours Concerns
The Safeguarding Team are available to support during usual college business hours (Monday – Thursday, 08:30am – 17:00pm and Friday, 08:30am – 16:30pm). However, in rare circumstances staff may become aware that a student is at immediate risk of harm outside of college business hours (e.g., evenings, weekend or holidays).

In these circumstances, staff must follow these steps:

- For emergencies: Contact 999 (Police, Ambulance, Fire)
- For non-emergencies: Contact 101 (for Police) or 111 (for NHS)
- For mental health crises: Contact emergency services (999 for Ambulance or 111 for NHS Advice). Inform the student's emergency contact. Advice and support can also be sought from the Samaritans (on 116 123).

- For out of hours social care referrals: Contact the relevant Local Authority:

Local Authority	Contact Number
Surrey	01483 517898
Reading, Windsor and Maidenhead, Wokingham	01344 786543
Bracknell	01344 351999
Oxfordshire (including Banbury and Blackbird Leys)	0800 833408
Hampshire	0300 555 1373
Unsure of which Local Authority to contact?	Use this tool: https://www.gov.uk/find-local-council

After making an 'out of hours' referral, notify the Safeguarding Team as soon as possible who will offer continued support. Activate Learning recognises that having dealt with an emergency or crisis, staff may also require support. If this is the case, you can speak to your line manager or HRBP for advice on where to seek assistance.

Escalating Concerns
If you feel a safeguarding concern hasn't been addressed properly, escalate it to a senior member of the Safeguarding Team (Deputy Designated Safeguarding Lead or the Director – Designated Safeguarding Lead).

If after escalating your concern, staff feel appropriate action has not been taken, they can refer to the Whistleblowing Policy, or contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 or help@nspcc.org.uk

Reporting Concerns About Staff or Adults in Authority
If you believe an adult in a position of authority has harmed or poses a risk to a child, you must report this immediately to HR or the Designated Safeguarding Lead (DSL). They will involve the Local Authority Designated Officer (LADO) for further action, in line with the Allegations Against Staff Procedure.

References
This document should be read in conjunction with the following policies:
- Activate Learning Safeguarding and Child Protection Policy
- Activate Learning Child on Child Abuse Procedure
- Student Positive Behaviour Management Policy and Procedure
- Allegations Against Staff Procedure
- Death Of Community Member and Postvention Procedure
- Student Criminal Convictions Procedure
- Students Who Go Missing During the Day Procedure
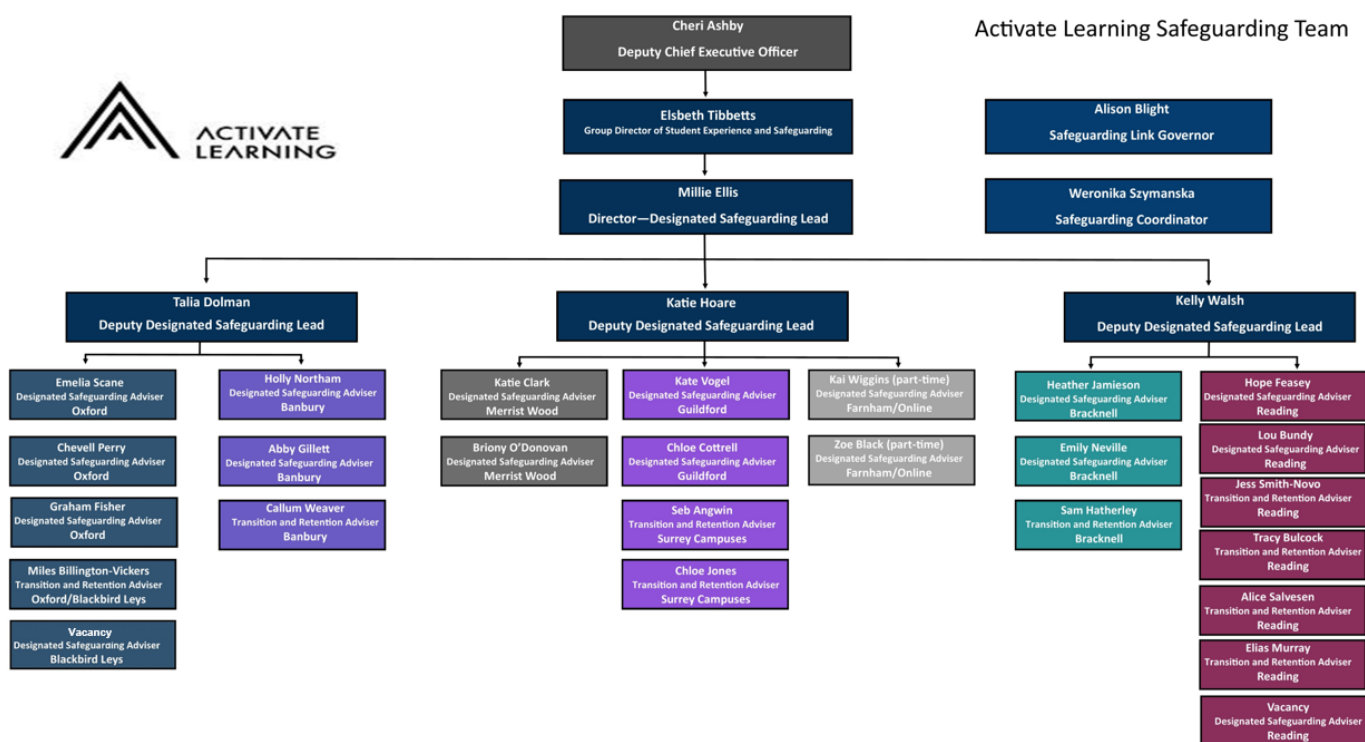- Whistleblowing Policy

Appendices
Appendix 1 - Safeguarding Team Structure (as of October 2024)
Appendix 2 - Safeguarding Thresholds
Appendix 3 - Residential Out of Hours Safeguarding Procedure

Appendix 1
Safeguarding Team (correct as of October 2024)

Activate Learning Safeguarding Team

Cheri Ashby — Deputy Chief Executive Officer

Elsbeth Tibbetts — Group Director of Student Experience and Safeguarding

Millie Ellis — Director—Designated Safeguarding Lead

Alison Blight — Safeguarding Link Governor

Weronika Szymanska — Safeguarding Coordinator

Talia Dolman — Deputy Designated Safeguarding Lead
- Emelia Scane — Designated Safeguarding Adviser, Oxford
- Chevell Perry — Designated Safeguarding Adviser, Oxford
- Graham Fisher — Designated Safeguarding Adviser, Oxford
- Miles Billington-Vickers — Transition and Retention Adviser, Oxford/Blackbird Leys
- Vacancy — Designated Safeguarding Adviser, Blackbird Leys
- Holly Northam — Designated Safeguarding Adviser, Banbury
- Abby Gillett — Designated Safeguarding Adviser, Banbury
- Callum Weaver — Transition and Retention Adviser, Banbury

Katie Hoare — Deputy Designated Safeguarding Lead
- Katie Clark — Designated Safeguarding Adviser, Merrist Wood
- Briony O'Donovan — Designated Safeguarding Adviser, Merrist Wood
- Kate Vogel — Designated Safeguarding Adviser, Guildford
- Chloe Cottrell — Designated Safeguarding Adviser, Guildford
- Seb Angwin — Transition and Retention Adviser, Surrey Campuses
- Chloe Jones — Transition and Retention Adviser, Surrey Campuses
- Kai Wiggins (part-time) — Designated Safeguarding Adviser, Farnham/Online
- Zoe Black (part-time) — Designated Safeguarding Adviser, Farnham/Online

Kelly Walsh — Deputy Designated Safeguarding Lead
- Heather Jamieson — Designated Safeguarding Adviser, Bracknell
- Emily Neville — Designated Safeguarding Adviser, Bracknell
- Sam Hatherley — Transition and Retention Adviser, Bracknell
- Hope Feasey — Designated Safeguarding Adviser, Reading
- Lou Bundy — Designated Safeguarding Adviser, Reading
- Jess Smith-Novo — Transition and Retention Adviser, Reading
- Tracy Bulcock — Transition and Retention Adviser, Reading
- Alice Salvesen — Transition and Retention Adviser, Reading
- Elias Murray — Transition and Retention Adviser, Reading
- Vacancy — Designated Safeguarding Adviser, Reading

Appendix 2
What constitutes a safeguarding concern?

A safeguarding concern relates to any situation where a student is or is at risk of being abused, harmed, exploited or neglected.

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events. Often, multiple concerns or risk factors overlap requiring careful handling. Every safeguarding incident is handled in a person-centred way, with a focus on the individual's specific needs and circumstances. Decisions are therefore made on a case-by-case basis.

Although each case is unique, here are common examples of safeguarding concerns that should be reported to the Safeguarding Team:

This list is not exhaustive, and safeguarding concerns can take many forms. If you are unsure whether an incident qualifies as a safeguarding issue, always seek guidance from the Safeguarding Team.

Safeguarding Concern	Examples
Addiction	Not having control over doing, taking, or using something to the point it may be harmful e.g., gambling, drugs, alcohol, pornography.
AI Generated Abuse	Artificial Intelligence (AI) refers to the simulation of human intelligence processes by machines, especially computer systems. AI is being used to generate indecent images of children. Child sexual abuse images are illegal in the UK, regardless of how it is produced.
Allegations Against Staff	An allegation that implies a staff member may have: • Behaved in a way which has or may have harmed a young person, • Possibly committed a criminal offence related to a child or adult at risk, • Indicates they may be unsuitable to work with children or may pose a risk of harm to children or adults at risk.

Bullying	Individuals or groups seek to harm, intimidate, or coerce someone who is perceived to be vulnerable e.g., • Physical assaults e.g., fights. • Verbal abuse e.g., name calling. • Threats of harm or intimidation. • Racial, sexual, or homophobic bullying. • Making silent, hoax or abusive calls.
Child-On-Child Abuse	Abusive behaviours involving children under the age of 18. May include: • Bullying (e.g., cyberbullying, prejudice-based and discriminatory bullying). • Abuse in intimate personal relationships between children. • Physical abuse such as hitting, kicking. • Sexual violence such as rape, assault by penetration and sexual assault. • Sexual harassment such as sexual comments, remarks, jokes. • Causing someone to engage in sexual activity without consent. • Consensual and non-consensual sharing of nude and semi-nude images and/or videos (e.g., sexting or youth produced sexual imagery). • Upskirting (e.g., taking a picture under a person's clothing without their permission). • Initiation/hazing type violence and rituals.
Concern For Parents / Carers	Concerns for student's family members which is having a detrimental impact on the child: • Family member in prison or affected by parental offending. • Parent/carer misusing substances. • Adult mental health issues. • Exposure to domestic abuse.
Criminal Exploitation	The manipulation of individuals, often children, into criminal activities, such as drug trafficking, carrying of weapons, stealing, etc., often by gangs or organised crime groups.
Cyberbullying	Bullying that occurs over digital platforms, including social media, text messages, or online forums. Includes: • Sending threatening or abusive text messages • Creating and sharing embarrassing images or videos • 'Trolling' - sending menacing or upsetting messages on social networks • Setting up hate sites or groups about a child • Encouraging young people to self-harm • Creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.
Death of a Community Member	The expected, unexpected or sudden death of a student or staff member e.g., due to ill-health, accident, or suspected suicide.
Domestic Abuse	A pattern of behaviour in relationships where one person exerts power and control over the other, which can be physical, emotional, financial, or sexual. Includes any type of coercive, controlling or threatening behaviour.
Emotional Abuse	Non-physical harm caused by verbal abuse, manipulation, or neglect that damages an individual's emotional well-being e.g., name calling, humiliation, threats of harms, exposing them to distressing events or information.
Fabricated Illness	When a caregiver makes up, exaggerates or causes illness in someone, often a child, to gain attention or sympathy e.g., giving them medicine they do not need.
Family Breakdown	The disintegration of family relationships, often due to conflict, divorce, or separation, affecting children's health, well-being or safety.
Female Genital Mutilation	The illegal and harmful practice of partially or fully removing the external female genitalia, for non-medical reasons - often for cultural or religious reasons. It's also known as female circumcision or cutting.
Financial Abuse	Exploiting someone's financial resources, typically through theft, fraud, or manipulation, often in relationships of trust. May also involve withholding funds.
Financial Poverty	A lack of financial resources that limits an individual's ability to meet basic needs like housing, food, and healthcare.

Forced Marriage	A marriage conducted without the full and free consent of both parties, often under threat or coercion. Any marriage of those under the age of 18 is now a crime.
Missing	When a student, particularly a vulnerable individual, disappears, causing concern for their safety and well-being. This could be from home, their placement, halls of residence, or from college / work placement.
Grooming	When someone builds a relationship, trust, and emotional connection with a child or vulnerable person to manipulate, exploit, or abuse them.
Harassment	Persistent unwanted behaviour, often involving threats or intimidation, directed at an individual, affecting their well-being e.g., bullying, stalking, cyberstalking, unwanted communication, etc.
Harmful Sexual Behaviour	Developmentally inappropriate sexual behaviour, which may be harmful or abusive e.g., inappropriate touching, using sexual violence or threats of violence, sexual activity with other children or adults.
Homelessness	A state in which an individual lacks a stable, safe, and permanent place to live e.g., living in unsafe home circumstances, at risk of being "kicked out" of home, sofa-surfing, etc.
Institutional Abuse	Mistreatment, neglect, or exploitation of individuals within a care setting, such as hospitals or residential care homes.
Mental Ill-Health	All people have 'mental health', but this can become a safeguarding concern when mental ill-health puts them or others at risk of harm. Examples include: • Self-harm. • Suicidal thoughts, plans or attempts. • Historic self-harm or suicidality. • Instances of being hospitalised or sectioned under the Mental Health Act. • Eating disorders such as anorexia or bulimia. • Conditions which have a negative impact on a student's health or wellbeing e.g., depression, bi-polar, psychosis or schizophrenia. • Bereavement or bereaved by suicide.
Modern Slavery	The exploitation of individuals through forced labour, domestic servitude, or human trafficking, often involving coercion or deception.
Neglect	The failure to provide necessary care, assistance, and supervision to a child or vulnerable person, resulting in harm or risk of harm e.g., inadequate food, clothing, shelter, supervision, healthcare, etc.
Online Abuse	Online abuse is any type of abuse that happens on the internet, using technology like computers, tablets, mobile phones, games consoles and other internet-enabled devices. E.g., cyberbullying, harassment, pressure or coercion to send sexual images, exposure to harmful content, etc.
Physical Abuse	Intentional infliction of bodily harm on another person through acts like hitting, shaking, burning, etc.
Privately Fostered	A child living with someone who is not their parent or a close relative for an extended period, usually more than 28 days, without local authority involvement
Radicalisation	The process by which individuals are groomed or encouraged to adopt extremist views and potentially engage in terrorism or violence.
Self-Neglect	When an individual (over the age of 18) fails to attend to their basic needs, such as personal hygiene, health, or living conditions, to the extent that it endangers their health or well-being.
Serious Violence	Violent behaviour involving young people, often involving weapons or resulting in severe harm. Often linked to gang-affiliation and criminal exploitation.
'Sextortion'	Sexual extortion, known as 'Sextortion', is a form of blackmail where someone threatens to share sexually explicit images or videos to extort money or force someone to do something against their will. It is a type of online abuse, and when perpetrated towards a child, is a form of child sexual abuse.
Sexual Abuse	Non-consensual sexual activity, including forcing or manipulating someone into unwanted sexual acts e.g., rape, sexual assault. Can be online or in person. This could include abuse that took place when the student is now an adult but was a child at the time of the abuse e.g., 'non-recent' abuse or historical incidents of sexual abuse.

Sexual Assault	A student over 18 has been the victim or perpetrator of a sexual assault such as rape, assault by penetration, sexual touching, forced to kiss someone – without consent.
Sexual Exploitation	Young people under 18, are coerced or groomed into exploitative situations and relationships. May be given things such as gifts, money, drugs, alcohol, status, or affection in exchange for taking part in sexual activities.
Sexual Harassment	Sexual harassment is unwanted sexual behaviour that makes someone feel upset, scared, offended, or humiliated. E.g., sexual comments or gestures, someone exposing themselves, staring or leering at someone.
So-Called "Honour"-Based Abuse	Abuse committed to protect or defend the so-called "honour" of a family or community, often involving violence or coercion e.g., female genital mutilation, forced marriage, physical abuse, etc.
Stalking	Persistent and unwanted attention from an individual that causes fear or distress, often involving following or monitoring the victim. E.g., following someone, going to their home uninvited, monitoring their whereabouts or monitoring forms of communication.
Substance Misuse	The harmful or excessive use of drugs or alcohol, which negatively affects health and well-being. Can also include misusing someone else's prescribed medication e.g., mental health medication.
Trafficking	The illegal movement of people, often for the purposes of exploitation, such as forced labour, forced marriage, benefit fraud, or criminal and/or sexual exploitation.
Youth Produced Sexual Imagery	The sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be consensual or non-consensual. Such imagery involving anyone under the age of 18 is unlawful. Adults sharing nudes or semi-nudes of under 18-year-olds is a form of child sexual abuse and is a criminal offence.

For concerns that do not meet the threshold for 'harm' (as described above), there is a wealth of holistic and pastoral support available for learners at Activate Learning.

Below are some examples of who else may be able to support learners with low level, pastoral, wellbeing or behaviour concerns.
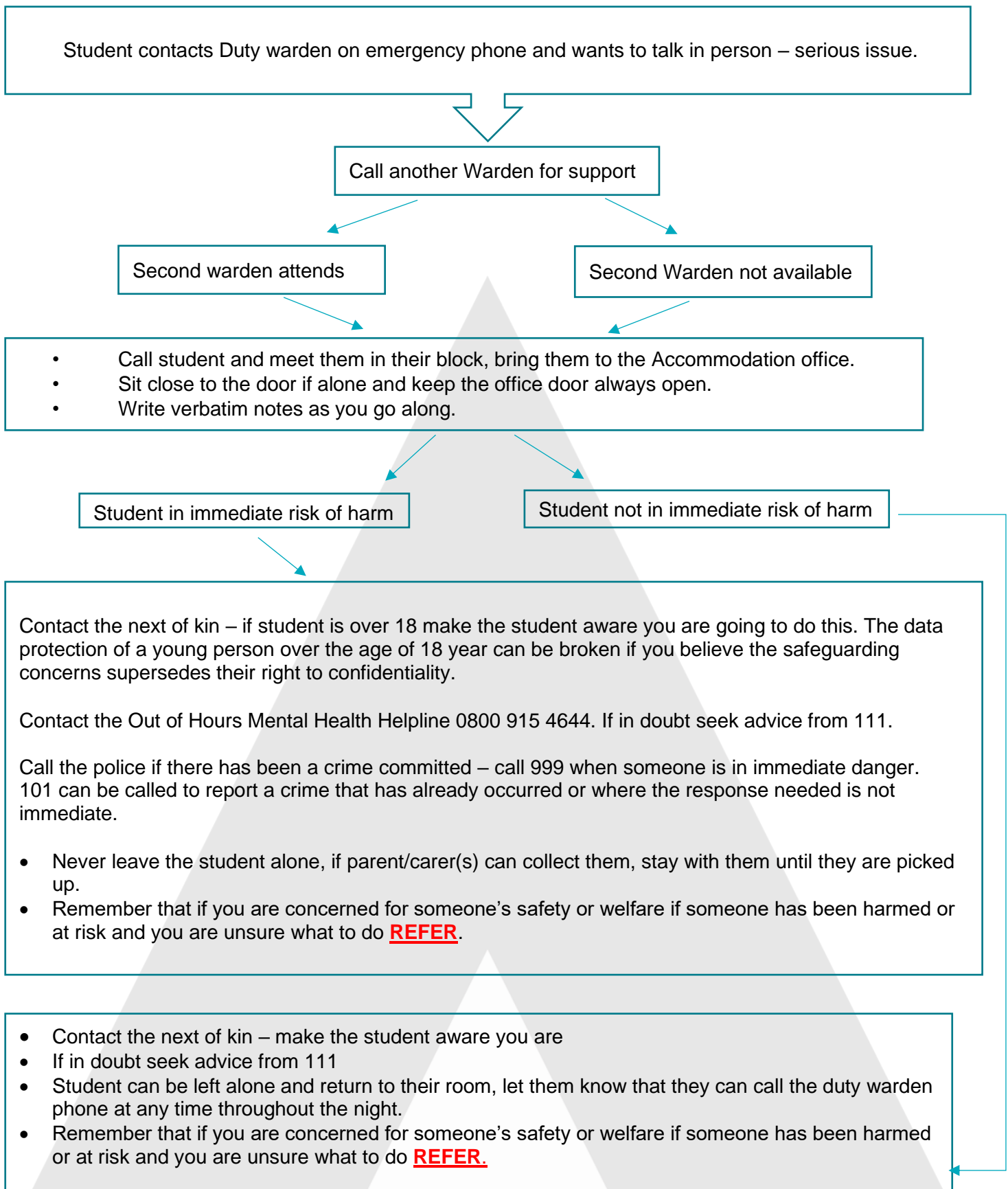
Nature of concern	Who to contact	Next steps
Behavioural incidents on site such as a fight, verbal threats, malicious fire alarm, damage to property.	Behaviour and Welfare Officer Duty Manager	Behaviour and Welfare Officer to investigate, take statements and act upon immediately. Duty Manager to make decision whether students need to be suspended, immediately. If under 18, or under 25 with an EHCP, guardian's to be contacted. Faculty to initiate Student Positive Behaviour Management Procedure. Safeguarding Team to be contacted if there was physical/emotional harm to student(s)/staff e.g., someone has been assaulted. Behaviour and Welfare Officer/Safeguarding Team to report to Police/Social Care, if necessary.
Emotional wellbeing e.g., feeling anxious, low motivation, issues with sleep, friendship issues, struggling with college work etc.	Tutor Progress Coach Counsellor Wellbeing Adviser	Tutor to offer emotional or practical support through signposting or referral to Progress Coaches, Wellbeing Advisers and/or Counsellors, with consent. If under 18, or under 25 with an EHCP, guardian's to be contacted by tutor.

General student absence (illness, no contact).	Tutor Faculty Co-Ordinator / Welfare Co-Ordinator (Lifeskills Faculty)	Tutor/Faculty Co-Ordinator to call student/emergency contact on the same day to ascertain reasons for absence. If absent for a prolonged period, Tutor/Faculty to arrange a 'Cause for Concern' meeting with student to address the concerns. If under 18, or under 25 with an EHCP, guardian's to be contacted by tutor. Refer to Retention Panel.
Student is absent and emergency contact does not know where they are. Information provided indicates student is vulnerable or unsafe.	Safeguarding Team, immediately.	Faculty to make enquiries with emergency contacts/friends etc, in line with Students Who Go Missing During the Day Procedure. If student's whereabouts or safety cannot be established; Safeguarding Team to report student missing to Police.
Student has been charged with a criminal offence.	Behaviour and Welfare Officer Safeguarding Team	Behaviour and Welfare Officer to contact the student to complete Criminal Conviction Disclosure Form in line with Student Criminal Convictions Procedure. Safeguarding Team to be notified if information shared indicates a risk to student(s)/staff. Safeguarding Team to liaise with Police/Social Care/external agencies. Safeguarding Team to conduct a Safeguarding Personal Risk Assessment.
Student is at risk of or experiencing harm, abuse, exploitation or neglect or you have concerns about student's safety or welfare.	Safeguarding Team, immediately.	Safeguarding Team to contact the student. Safeguarding Team will make appropriate referrals to Social Care/Police and other external agencies. Safeguarding Team to complete a Risk Assessment, if required.
Student is not coping / not able to access course due to physical or mental health.	Tutor Faculty Safeguarding Team.	Faculty to liaise with Safeguarding Team. Arrange a 'fitness to study' meeting with student to address the concerns. Follow 'fitness to study/reside' procedure. If under 18, or under 25 with an EHCP, guardian's to be contacted by tutor. Safeguarding Team to refer to additional support, if required.
Student presents within college in a mental health crisis e.g., self-harm/suicidal ideation.	All staff are responsible for ensuring the student is physically safe before seeking further support. Once student is safe, Safeguarding Team.	Students' safety needs to be addressed immediately. The Safeguarding Team will assess the level of risk and work with external agencies.

Student becomes a young parent, young carer, 'cared for' by the Local Authority or leaves Local Authority Care.	Transition and Retention Advisor	Transition and Retention Advisor to liaise with student, Social Care, and external agencies to offer ongoing support.
Student shares they have a Social Worker, are on a Child in Need Plan or Child Protection Plan.	Safeguarding Team	Safeguarding Team will liaise with Social Care.
Student presents with extremist ideology or is at risk of radicalisation.	Tutor Faculty Safeguarding Team	Tutor/Faculty to explore the student's views with the student. Safeguarding Team to refer to Police/Channel Programme and if appropriate, Social Care. If student is under 18 or 25 with an EHCP, Safeguarding Team to share concerns with guardians. Safeguarding Team to complete a Safeguarding Personal Risk Assessment.
Student believed to be in possession of a weapon/drugs or under the influence of drugs/alcohol on campus.	Behaviour and Welfare Officer Duty Manager Safeguarding Team	Behaviour and Welfare Officer to be notified immediately. Search procedure instigated by staff members trained and authorised to search students. In the event of a find, paraphernalia to be confiscated and safe arrangements made for student to be sent home. If under 18 or 25 with an EHCP, parent/carer(s) to be contacted. Faculty to instigate Student Positive Behaviour Management Procedure. Safeguarding Team to be notified and if required refer to Social Care/Police.

Residential Out of Hours Safeguarding Procedures

Student contacts Duty warden on emergency phone and wants to talk in person – serious issue.

Call another Warden for support

Second warden attends

Second Warden not available

- Call student and meet them in their block, bring them to the Accommodation office.
- Sit close to the door if alone and keep the office door always open.
- Write verbatim notes as you go along.

Student in immediate risk of harm

Student not in immediate risk of harm

Contact the next of kin – if student is over 18 make the student aware you are going to do this. The data protection of a young person over the age of 18 year can be broken if you believe the safeguarding concerns supersedes their right to confidentiality.

Contact the Out of Hours Mental Health Helpline 0800 915 4644. If in doubt seek advice from 111.

Call the police if there has been a crime committed – call 999 when someone is in immediate danger. 101 can be called to report a crime that has already occurred or where the response needed is not immediate.

- Never leave the student alone, if parent/carer(s) can collect them, stay with them until they are picked up.
- Remember that if you are concerned for someone's safety or welfare if someone has been harmed or at risk and you are unsure what to do **REFER**.

- Contact the next of kin – make the student aware you are
- If in doubt seek advice from 111
- Student can be left alone and return to their room, let them know that they can call the duty warden phone at any time throughout the night.
- Remember that if you are concerned for someone's safety or welfare if someone has been harmed or at risk and you are unsure what to do **REFER.**

Ensure the warden log is completed, and information is passed on to the Accommodation Day staff, including any notes made on the disclosure, day staff will liaise with Safeguarding and Welfare and arrange any follow up meetings.