



# House of Learning Tuition Ltd

## Child Protection and Safeguarding Policy

The purpose of this policy statement is:

- to protect children and young people who receive HOL Tuition's services from harm. This includes the children of adults who use our services
- to provide staff, as well as children and young people and their families, with the overarching principles that guide our approach to child protection. This policy applies to anyone working on behalf of HOL Tuition.

### Purpose

*Providing high quality education that gives our students the knowledge, skills and experience to be successful. To help children enjoy learning and transform them into confident beings.*

- **Safeguarding Legislation and Guidance:**

The following safeguarding legislation and guidance has been considered when drafting this policy:

- ● Section 175 of the Education Act 2002
- ● Section 157 of the Education Act 2002
- ● The Safeguarding Vulnerable Groups Act 2006
- ● The Teacher Standards 2012
- ● Working Together to Safeguarding Children 2018
- ● Keeping Children Safe in Education 2022
- ● What to do if you're worried a child is being abused 2015

### Roles and Responsibilities

- **THE DESIGNATED SAFEGUARDING LEAD (DSL)**

The Designated Safeguarding Officer (DSO) takes **lead responsibility** for safeguarding and child protection at House of Learning. HOL's Designated Safeguarding Lead is Richa Karia (Director) who has the status to carry out the duties of the post, which include:

- Ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publicly available
- Advising and supporting staff on child protection and safeguarding matters
- Encouraging a culture of listening to students
- Managing safeguarding referrals to children's social care, the police, or other agencies
- Taking part in strategy discussions and inter-agency meetings



- Making staff aware of local Multi Agency Safeguarding Partnership training courses and the latest local safeguarding arrangements
- Undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.

### **HOL Equality and Diversity Ethos Statement**

This policy and procedure is subject to The Equality Act 2010. HOL is committed to promoting and supporting equality and diversity in all aspects of its work. HOL's aims to create an environment where all individuals have the opportunity to achieve their full potential, and gain a feeling of self-esteem and respect for and from others. HOL expresses its opposition to all forms of inequality and discrimination.

### **Policy Aims**

- ● To provide all staff with the necessary information to enable them to meet their child protection responsibilities;
- ● To ensure that HOL responds in a measured and supportive manner to reports or suspicions of abuse;
- ● To ensure consistent good practice;
- ● To demonstrate HOL's commitment with regard to child protection to students, parents and other partners.

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### **Child Protection Statement**

- House of Learning Tuition recognises that it has a statutory and moral responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where students are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that students receive effective support, protection and justice. Policies will be reviewed at least annually unless an incident or new legislation or guidance suggest the need for interim review.

### **Safeguarding Legislation and Guidance:**

The following safeguarding legislation and guidance has been considered when drafting this policy:

- ● Section 175 of the Education Act 2002
- ● Section 157 of the Education Act 2002
- ● The Safeguarding Vulnerable Groups Act 2006
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### **Policy Statement and Principles**

Safeguarding and promoting the welfare of young people and vulnerable adults. Protecting them from maltreatment, preventing impairment of their mental and physical health or development. Ensuring that they can grow up in circumstances consistent with the provision of safe and effective care and taking action to enable them to have the best possible outcomes.



- ● Welfare of the student is paramount;
- ● All staff have a responsibility to provide a safe environment in which children can learn. Safer students make more successful learners;
- ● All students, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- ● All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a young person or vulnerable adult is at risk of harm
- ● Students and staff involved in child protection and safeguarding issues will receive appropriate support and training;
- ● Safeguarding and promoting the welfare of students is **everyone's** responsibility.
- **Everyone** who comes into contact with students and their families have a role to play. In order to ensure the student and family receive the right level of support, at the right time, everyone has a role to play in identifying concerns, sharing information and taking prompt action;
- ● Representatives of the whole of the HOL community including students, parents, staff and senior management will be involved in policy development and review;
- ● Providing high-quality education that gives our students the knowledge, skills and experience to be successful in their chosen career.

#### **GOOD PRACTICE GUIDELINES AND STAFF CODE OF CONDUCT**

- Treating all students with respect
- Setting a good example by conducting ourselves appropriately
- Involving students in decisions that affect them
- Encouraging positive, respectful and safe behaviour among students
- Being a good listener
- Being alert to changes in students' behaviour and to signs of abuse, neglect and exploitation
- Recognising that challenging behaviour may be an indicator of abuse
- Reading and understanding HOL's child protection policy/keeping children safe in education, and guidance documents on wider safeguarding issues for example bullying, behaviour, physical contact and information-sharing
- Being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
- Referring all concerns about a student's safety and welfare to the DSL, or, if necessary directly to police or social care
- To meet and maintain our responsibilities towards students we need to agree standards of good practice which form a code of conduct for all staff. Good practice includes:
  - Asking the student's permission before initiating physical contact, such as assisting with dressing, or administering first aid.
  - Maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language.
  - Being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.

Being aware of children with special educational needs (including to inform and be informed by Education, Health and Care Plans), unborn children where there are concerns, children in hospital, children in mental health inpatient settings, children with specific communication needs, asylum seeking children, children considered at risk of gang activity and association with organised crime groups, children at risk of female genital mutilation, children who are in the youth justice system, and children returning home.

- Following HOL's rules with regard to communication with students and use of social media and online networking.

- Ensures that the DSL role is explicit in the role holder's job description.
- Has a Child Protection Policy and procedures, including a staff Code of Conduct, that are consistent with the local Multi Agency Safeguarding Partnership and statutory requirements.
- Has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Principal;
- Follows safer recruitment procedures that include statutory checks on staff suitability to work with students.
- Develops a training strategy that ensures all staff, including the Principal, receive information about HOL's safeguarding arrangements on induction and appropriate child protection training.
- Considers how students may be taught about safeguarding, including e-safety as part of a broad and balanced curriculum.

The Governing Body nominates a member to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Principal.

### DEFINITIONS

Child: A young person under the age of 18

Vulnerable Adult: 'A person aged 18 years or over who is or may be in need of community care services by reason of mental or another disability, age or illness and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' - *Dept of Health ('No Secrets', drawn from the consultation white paper, 'Who Decides' - Lord Chancellor's Department 1997)*

Allegation: A member of staff, governor, contractor or volunteer working with children or vulnerable adults is accused of committing abuse.

Abuse:

- ● A violation of an individual's human and civil rights by any other person.
- ● May consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into financial or sexual transactions to which he or she has not consented or cannot consent.
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- ● Abuse can occur in any relationship and may result in significant harm to or exploitation of the person subject to it. - *Dept of Health, 'No Secrets'*
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- **Students Who May be Particularly Vulnerable**

Some students may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our students receive equal protection, we will give special consideration to students who are:

- Living away from home or in temporary accommodation
- Living in chaotic and unsupportive home situations
- Living transient lifestyles
- Affected by parental substance misuse, domestic violence or parental mental health needs
- Vulnerable to being bullied, or engaging in bullying
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- Do not have English as a first language
- At risk of sexual exploitation, female genital mutilation, county lines, peer on peer abuse, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive.

### **Students With Special Educational Needs and Disabilities**

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

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

### **Private Fostering Arrangements**

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

### **Abuse of Position of Trust**

All staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of HOL staff and a student under 18 may be a criminal offence. HOL's Staff Behaviour Policy/Code of Conduct/Ethical Practice sets out our expectations of staff.

### **Whistle Blowing if you Have Concerns About a Colleague**

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. HOL's whistleblowing code enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Director. Complaints about the SLT should be reported to the Director's chair of the HOL Tuition Ltd. Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

### **Against Staff**

When an allegation is made against a member of staff, including sessional/supply teachers, our set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Keeping Children Safe in Education (DfE, 2022). Allegations concerning staff who no longer work at HOL's, or historical allegations will be reported to the police.

### **Staff CPD and Safeguarding Training**

It is important that all staff receive CPD to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff will receive a briefing during their induction, which includes HOL's child protection and safeguarding policy, reporting and recording arrangements, and details for the DSL. All staff, including the DSL will receive CPD that is regularly updated. All staff will also receive safeguarding and child protection updates via email and staff meetings throughout the year along with mandatory annual safeguarding training for all staff.

### **Safer Recruitment**



Our college complies with the requirements of Keeping Children Safe in Education (DfE 2022) and the local Multi Agency Safeguarding Partnership by carrying out the required checks and verifying the applicant's identity, qualifications and work history. HOL's Staff Recruitment policy and procedures set out the process in full and can be found in the staff shared drive. At least one member of each recruitment panel will have attended safer recruitment training.

### **Contractors**

HOL checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the day.

### **Staff/Student Online Relationships**

HOL provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

### **RECOGNISING ABUSE**

#### **Recognising abuse**

It is the responsibility of all staff, including volunteers to report concerns NOT to decide whether it is or it is not abuse. The need to protect the child or vulnerable adult is of paramount importance; even if you think a disclosure or allegation may be untrue you must still report it.

To ensure that our students are protected from harm, we need to understand what types of behaviour constitutes abuse and neglect. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2022) refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

### **Taking Action**

Any student, in any family in any college could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". Key points for staff to remember for taking action are:

- In an emergency take the action necessary to help the student, if necessary call 999
- Report your concern as soon as possible to the DSL, definitely by the end of the day
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Seek support for yourself if you are distressed

#### **If You Are Concerned About a Student's Welfare**

There will be occasions when staff may suspect that a student may be at risk. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk and ask if they are OK or if they can help in any way. If the student does reveal that they are being harmed, staff should follow the advice below.

Following an initial conversation with the student, if the member of staff has concerns, they should **discuss their concerns with the DSL.**

#### **Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and

prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures which can be accessed through HOL's Bullying Policy.

### **Child on Child Abuse**

Children may be harmed by other children or young people. All staff recognise that children are capable of abusing their peers and should be clear about HOL's policy and procedures regarding peer on peer abuse. All peer on peer abuse is unacceptable and will be taken seriously.

Peer on peer abuse can take many forms, including:

- Physical abuse such as biting, hitting, kicking or hair pulling
- Sexually harmful behaviour/sexual abuse such as inappropriate sexual language, touching, sexual assault
- Sexting, including pressuring another person to send a sexual imagery or video content
- Teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- Initiation/hazing - used to induct newcomers into an organisation such as sports team or college groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- Prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with peer on peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. At our college, we take the following steps to minimise or prevent the risk of peer on peer abuse.

- **Information gathering** - students, staff and witnesses will be spoken to with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** - if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, HOL will normally seek to discuss concerns about a student with parents. Our focus is the safety and wellbeing of the young person and so if HOL believes that notifying parents could increase the risk to the young person or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Where allegations of sexual violence or sexual harassment are made, HOL will act in accordance with the guidance set out in Part 5 of Keeping Children Safe in Education (2022).

### **Supporting those involved**

The support required for the student who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the student that harmed.

We will seek to understand why the student acted in this way and consider what support may be required to help the student and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

### **Online Safety**

As the students work regularly online/research tasks, it is essential that students are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to students, who can contact our student and the personal conduct of our students online.

### **Sexting**

There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The UKCCIS advice document refers to this as 'youth produced sexual imagery'.

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate. This may include seizure of devices and interviews with the young people involved.

### **Child Sexual Exploitation**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

### **Child Criminal Exploitation**

Some specific forms of child criminal exploitation can be transportation of drugs or money, shoplifting, or pickpocketing. Children can become trapped as perpetrators can threaten them with violence. Children could be forced into carrying weapons such as knives and can often commit crimes themselves. Their vulnerability as victims is not always recognised by adults and are not treated as victims despite the harm they have received.

- The experience of girls who are criminally exploited can be different to that of boys. Boy and girls being criminally exploited might be a higher risk of sexual exploitation.

### **Domestic Abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on



children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

### **Honour-Based Abuse**

‘Honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so college staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female or male does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

Children may be married at a very young age, and well below the age of consent in England. College staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to England.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

### **Radicalisation and Extremism**

The Government defines extremism 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.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and colleges should also remain alert to the risk of radicalisation into white supremacy extremism.

### **MENTAL HEALTH**

All staff at HOL are aware that mental health problems can, in some cases, be an indicator that a young person or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where staff have a mental health concern about a young person or vulnerable adult that may also be a safeguarding concern, they should raise the issue by informing the DSL.

### **WHAT TO DO IF A STUDENT DISCLOSES TO YOU**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the student know that in order to help them they must pass the information on to the DSL. The point at which they tell the student this is a matter for professional judgement. During their conversations with the student staff will:

- Allow them to speak freely
- Remain calm and not overreact



- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- Not be afraid of silences
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the student’s mother think about it
- Do not automatically offer any physical touch as comfort
- Avoid admonishing the student for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ may be interpreted by the student to mean that they have done something wrong
- Tell the student what will happen next
- Report verbally to the DSL even if the student has promised to do it by themselves
- Write down notes as soon after the disclosure as possible and share with DSL
- Seek support if they feel distressed

### **Notifying Parents**

HOL will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the student. Therefore, if HOL believes that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.

### **Confidentiality and Sharing Information**

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, and SDSL (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

Following a number of cases where senior leaders in schools and colleges had failed to act upon concerns raised by staff, Keeping Children Safe in Education (2022) emphasises that any member of staff can contact children’s social care if they are concerned about a child.

Child protection information will be stored and handled in line with our Retention and Destruction Policy.

Information sharing will take place in a timely and secure manner and where:

- It is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Welfare forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant staff Members. Child protection information will be stored separately from the students coursework file and the students ILP (Individual Learning Plan) will be ‘tagged’ to indicate that separate information is held.

The DSL will normally obtain consent from the student and/or parents to share sensitive information within HOL or with outside agencies. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for not obtaining consent. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to their SLT link who will discuss with the Vice Principal/Principal.

The GDPR and the Data Protection Act 2018 do not prevent college staff from sharing information with relevant agencies, where that information may help to protect a student.

### **Photography and sharing images policy**

We will seek to keep children and young people safe by:

- always asking for written consent from a child and their parents or carers before taking and using a child’s image



- always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of children
  - making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published
  - changing the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
  - never publishing personal information about individual children and disguising any identifying information (for example the name of their school or a school uniform with a logo)
  - making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information)
- reducing the risk of images being copied and used inappropriately by:
  - only using images of children in appropriate clothing (including safety wear if necessary)
  - avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
  - using images that positively reflect young people's involvement in the activity. We will also develop a procedure for reporting the abuse or misuse of images of children as part of our child protection procedures. We will ensure everyone involved in our organisation knows the procedures to follow to keep children safe. Photography and/or filming for personal use When children themselves, parents, carers or spectators are taking photographs or filming at our events and the images are for personal use, we will publish guidance about image sharing in the event programmes and/or announce details of our photography policy before the start of the event.
- reminding parents, carers and children that they need to give consent for [name of group/organisation] to take and use their images
- asking for photos taken during the event not to be shared on social media or asking people to gain permission from children, their parents and carers before sharing photographs and videos that include them
- recommending that people check the privacy settings of their social media account to understand who else will be able to view any images they share
- reminding children, parents and carers who they can talk to if they have any concerns about images being shared. Photography and/or filming for [name of group/organisation]'s use We recognise that our group leaders may use photography and filming as an aid in activities such as music or drama. However, this should only be done with [name of group/organisation]'s permission and using our equipment. Children, young people, parents and carers must also be made aware that photography and filming is part of the programme and give written consent. If we hire a photographer for one of our events, we will seek to keep children and young people safe by:
  - providing the photographer with a clear brief about appropriate content and behaviour
  - ensuring the photographer wears identification at all times
  - informing children, their parents and carers that a photographer will be at the event and ensuring they give written consent to images which feature their child being taken and shared



- not allowing the photographer to have unsupervised access to children
- not allowing the photographer to carry out sessions outside the event or at a child's home
- reporting concerns regarding inappropriate or intrusive photography following our child protection procedures.