



Safeguarding & Prevent Policy

Last approved: October 2024

Approved by: Quality Committee

Next review due: October 2025

1. Policy Definition & Scope

- 1.1 This Policy is managed by BN1 Arts Executive Committee, who review it on an annual basis and, if updates are required, recommend them to the Academic & Quality Committee for approval.
- 1.2 This Policy applies to all Further Education (FE) delivered at BN1 Arts.
- 1.3 This Policy sets out the principles and commitments of all BN1 Arts colleges, where FE is delivered. In doing so, it aims to safeguard children and vulnerable adults, as well as safeguarding college management, staff, volunteers, and partners in carrying out their duties in teaching, supervising, and supporting learners at all college sites and external facilities, both in the workplace and by distance learning.
- 1.4 This Policy provides high-level information on the requirements of the Prevent Duty, BN1 Arts' approach to complying with the duty, and how the arrangements required under the Duty are being satisfied. Further details on specific arrangements in place are provided in separate policies and procedures (as noted throughout).
- 1.5 For the purposes of this Further Education policy, the Institute defines:
- a **child** as a person who is under the age of 18.
 - a **vulnerable adult** as an individual over the age of 18 who may have a mental or other disability or illness and lacks the capacity to take care of him or herself (i.e. at risk of neglect); and/or who may be unable to keep him or herself safe from the risk of significant harm, abuse or exploitation, including the risk of radicalisation or being drawn into terrorism.
 - **staff** as *anyone working at the Institute who encounters children or vulnerable adults, whether full time, part time, sessional or voluntary.*
- 1.6 BN1 Arts is committed to taking all reasonable steps to promote and safeguard the welfare of students engaged in any activity and all UK Colleges pay close attention to, and work within the legislative safeguarding requirements, and the statutory Prevent Duty. The statutory Prevent Duty Guidance 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 and calls for the death of members of our armed forces, whether in this country or overseas”. BN1 Arts promotes these values to its students, via its **Universal Values Statement**.
- 1.7 BN1 Arts ensures that all staff are clear that safeguarding is everyone's responsibility, and that all staff are aware of the signs and symptoms of abuse so that they can respond promptly and appropriately to safeguarding concerns. Where appropriate, BN1 Arts works with other professionals to ensure a coordinated response to safeguarding issues.

1.8 BN1 Arts ensures staff can identify students who have or had a social worker. This includes ensuring that staff:

- know who these students are
- understand their academic progress and attainment and maintain a culture of high aspirations for this cohort
- are supported to identify the challenges that students in this group might face
- make reasonable adjustments so that they act to best support these students.

1.9 This policy exists to ensure that BN1 Arts implement appropriate arrangements, systems and procedures to ensure that all staff have the right skills, means and resources to protect children and vulnerable adults from harm. Furthermore, BN1 Arts recognises that students who are abused or witness violence may find it difficult to develop a sense of self-worth and that the Institute may be the only stable, secure and predictable environment in the lives of those students at risk. BN1 Arts will endeavor to support those students through a range of mechanisms including a positive ethos where students feel secure and liaison with external agencies and expertise such as Social Services and other relevant support services.

2. Statutory Framework

In order to safeguard and promote the welfare of all, BN1 Arts will act in accordance with the following legislation and statutory guidance:

- Keeping Children Safe in Education (2024)
- The Children Act (1989 and 2004)
- The Education Act (section 175, 2002)
- Mandatory Reporting of Female Genital Mutilation - Procedural Information (2020)
- Inspecting Safeguarding in Early Years, Education and Skills Settings (2019)
- Working Together to Safeguard Children (2023)
- The Care Act (2014)
- The Children (Performance and Activities) Regulations 2014
- A Guide to Child Performance Licensing (2020)

3. Policy Aims:

3.1. The Aims of this Policy are:

- To clarify standards of behavior for staff and students and raise awareness of child protection issues.

- To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse.
- To alert staff to the signs and indicators of safeguarding issues including abuse and neglect.
- To ensure BN1 Arts practices safe recruitment in checking the suitability of staff to work with young people and vulnerable adults.
- To support young people and vulnerable adults who have been abused.
- To establish a safe environment in which young people and vulnerable adults can learn and develop and equip them with the skills needed to make them safe.
- To establish and maintain an environment where young people and vulnerable adults feel secure, are encouraged to talk, and are listened to.
- To reduce the potential risks to students of being exposed to violence, extremism, exploitation, or victimisation.

3.2. In order to meet safeguarding aims, BN1 Arts will:

- ensure the appointment of one Designated Safeguarding Lead (DSL) at each site, as part of the College Management Team, who will be responsible for safeguarding issues and receive appropriate training and support for this role.
- ensure the appointment of Deputy Designated Safeguarding Leads (DDSL), as appropriate, to work alongside the DSL, who is also responsible for safeguarding issues and receive appropriate training and support for this role.
- ensure all staff are aware of the systems which support safeguarding via staff induction.
- ensure all staff and relevant external parties know how to contact the DSL and that DDSL are fully aware of their responsibilities
- ensure that all staff and relevant external parties understand their responsibilities in being alert to the signs of abuse and their responsibility for referring their concerns to the designated members of staff.
- notify Social Services and/or other appropriate agencies if there is an unexplained absence of a student who is on the child protection plan.
- notify Social Services and/or other appropriate agencies if there are any concerns about the welfare and safety of any students.
- develop effective links with referral agencies and cooperate as required with their enquiries regarding safeguarding matters.
- keep records of concerns about students, even where there is no need to refer the matter immediately.
 - ensure that all records are kept securely and in line with the BN1 Arts' IT and data protection policies.
- ensure strict adherence to procedures when an allegation of any kind concerning students is

made against a member of staff.

- ensure safer recruitment practices are followed in line with the Recruitment Policy.

4. BN1 Arts' Responsibilities

4.1. All Staff will:

- make themselves familiar with this Safeguarding Policy and the accompanying procedures, which will be provided at induction and made available on the VLE and the BN1 Arts website.
- read Part 1 of Keeping Children Safe in Education, compliance will be added to single central record (SCR) during induction and as updates are released, as well as made available on the VLE.
- be alert to the signs of abuse as detailed in the accompanying guidance and act in accordance with this policy if a student presents with indicators of abuse.
- report any concerns immediately to the Designated Safeguarding Lead (DSL), or deputies, and identify children who may benefit from early help.
- raise concerns about poor or unsafe practice with the designated safeguarding lead.
- participate in annual safeguarding updates/training.
- Understand the College's procedure for dealing with child-on-child abuse.

4.2. The College Principal will:

- act as support to the DSL in relation to their safeguarding responsibilities.

4.3. The Designated Safeguarding Lead will:

- act as the main point of contact for all matters concerning Safeguarding in relation to students, coordinate action within the college, and liaise with external agencies where appropriate.
- ensure that the policies and procedures are adopted by all at BN1 Arts and are appropriately monitored.
- monitor all safeguarding concerns and ensure that these are followed up in a professional and timely manner.
- ensure that appropriate strategies for recording and reporting incidents are in place and reviewed regularly.
- act as a source of support, advice, and expertise to staff on all matters of safeguarding, including supporting staff when they are deciding whether to make a referral to an external agency including a referral to the Channel programme where there is a radicalisation concern.
- encourage a culture of listening to children and vulnerable adults and taking account of their wishes and feelings.
- liaise with the College Principal to inform them of issues, especially on-going enquiries under section 47 of the Children Act 1989, and police investigations.

- ensure that there are appropriately qualified Deputy DSL's in place across BN1 Arts.
- ensure that all those within BN1 Arts are familiar with the FE Safeguarding Policy and any related procedures.
- ensure Safeguarding Policies are available publicly, and parents are aware of the fact that referrals about suspected abuse or neglect may be made, and the role of BN1 Arts in this.
- link with the Local Safeguarding Children's Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- ensure that BN1 Arts complies with its responsibilities with regard to training staff on Safeguarding and all appropriate compliance is logged on the SCR
- liaise with families and the appropriate child protection agencies on individual cases and make referrals to appropriate agencies in consultation with the Local Authority Designated Officer (LADO).
- ensure that appropriate action is taken to exclude, refuse admission or employment, to any individual who may pose a risk to children or vulnerable adults.
- ensure that all staff are aware of the early help that is available within BN1 Arts and externally and support staff to access this as appropriate.
- ensure Safeguarding induction training for all newly appointed staff, and whole staff refresher training, annually.
- provide a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part One of Keeping Children Safe in Education (2024)
- make use of Local Authorities' Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Social Care intervention is met.
- refer a student to the Local Authorities' Front Door for Families, when there are concerns about possible abuse and neglect.
- refer a student to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups.
- keep records of concerns about students, including the use of body maps, even where there is no need to refer the matter immediately.
- ensure that all child protection records are kept securely, separate from the main student file.
- ensure that all child protection files are transferred in a safe and timely manner when a student moves setting, both between and across phases, within and out of county.
- develop effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings.
- undertake appropriate training, every 2 years, relevant to the role of the DSL and the Prevent Duty.

4.4. Safeguarding Deputies will:

- Take on the responsibilities listed in 4.3 when deputising for the DSL
- ensure that they receive regular training and updates on current safeguarding practice.
- ensure that they follow up any safeguarding concerns reported to them, and that they are dealt with in a timely and professional manner.
- make appropriate referrals to Social/Community Services and/or the Police, where there are concerns that the child or vulnerable adult is or may be, being abused.

4.5. BN1 Arts' HR Team will:

- be committed to operating safer recruitment procedures.
- facilitate induction activities to include issuing KCSIE Part One, Annex A and the Code of Conduct, and providing access to training as appropriate to the role.
- monitor compliance with the Disclosure Barring Service (DBS) Policy by ensuring that there are sound arrangements for appropriate checks on staff.
- ensure that risk assessments are completed for new staff that don't have a completed DBS check in place on commencement of employment
- have robust procedures for managing allegations against staff, to include internal processes, liaison with the LADO and other agencies as appropriate, and submitting DBS referrals.
- Record compliance on SCR with oversight from the DSL

4.6. The Senior Leadership team will:

- ensure that every BN1 Arts Centre has a DSL who is a member of the College Management Team.
- ensure that the following policies and procedures in place:
 - Safeguarding policies for Further Education which comply with the statutory guidance and are updated annually.
 - Staff and Student codes of conduct which includes acceptable use of technologies, staff student relationships and communications including the use of social media.
 - Recruitment and selection policies and procedures in place which seek to prevent people who pose a risk of harm from working with children.
- ensure that BN1 Arts contribute to inter-agency working, in line with the statutory guidance Working Together to Safeguard Children.
- monitor safeguarding arrangements to ensure that they take into account the procedures and practices set up by the Local Safeguarding Children's Partnership.
- ensure that there is an appropriate safeguarding response to any children who go missing from education.

- ensure that students are taught about keeping themselves safe, in a way that is appropriate to their age and understanding.
- ensure that any member of staff found not suitable to work with students, will be notified to the Disclosure and Barring Service (DBS) for consideration for barring.
- ensure that there are procedures in place to handle allegations against Centre Managers, members of staff, volunteers and students.

5. Staff Training, Support & Supervision

5.1. All staff members working with FE students will receive appropriate safeguarding and child protection training, and receive refresher training annually. In addition, they will receive safeguarding and child protection updates as required, but at least annually. Training will also include members of the College community not employed directly by BN1 Arts, e.g. Security Staff.

5.2. Designated Safeguarding Lead (DSLs) and Deputies (DDSLs) will receive additional training so that they can effectively fulfill their responsibilities, this training will be refreshed biannually.

5.3. When staff join BN1 Arts, they will receive induction in safeguarding children, which will include the identity and role of the designated safeguarding lead and any deputies. They will be supplied with:

- a copy of this policy
- Part 1 of Keeping Children Safe in Education (KCSIE) 2024
- the Behaviour & Attitudes Strategy
- the staff code of conduct

5.4. All volunteers, supply staff and regular visitors to BN1 Arts will be given a visitors notice and told where the Safeguarding policies are kept, given the name of the DSL and informed of the College's procedures in reporting concerns.

5.5. We recognise that staff working at BN1 Arts who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will therefore support such staff by providing supervision and to seek further support such as counseling or regular supervision, as appropriate.

6. Safer Recruitment & Selection of Staff

- 6.1.** BN1 Arts pays due regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (KCSIE 2024), and has a written recruitment and selection policy linking explicitly to this policy.
- 6.2.** BN1 Arts' commitment to safeguard is stated on all job advertisements, publicity material, recruitment websites, and recruitment material
- 6.3.** The recruitment process is robust in seeking to establish the commitment of candidates to support BN1 Arts' measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.
- 6.4.** All staff working within BN1 Arts who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK.
- 6.5.** Colleges maintain a single central record of recruitment checks for audit purposes, as detailed in KCSIE 2024.
- 6.6.** Any member of staff working in regulated activity with FE students prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.
- 6.7.** Volunteers who are not working in regulated activity, will always be supervised. Regular volunteers will be DBS checked

7. Staff Expectations

7.1. All staff involved in the delivery of Further Education at BN1 Arts:

- have a duty and responsibility to safeguard children, young people and vulnerable adults studying FE Programmes, irrespective of their role
- are responsible for familiarising themselves with this Safeguarding Policy, accompanying procedures and to be aware of the systems in place which support safeguarding
- are responsible for identifying concerns early and providing help for children, young people,

and vulnerable adults to prevent concerns from escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989; i.e. Section 17 (Children in Need) and Section 47 (a child suffering harm, or likely to suffer significant harm). These concerns are discussed with the College's Designated Safeguarding Lead or one of their deputies

- are expected to know how to contact the Designated Safeguarding Leads (DSLs), deputies (DDSLs), the Centre Manager, and the Director responsible for safeguarding
- will be trained in the process and principles for sharing information within the College which supports safeguarding and how to raise concerns
- should be aware that safeguarding incidents and/or behaviors can be associated with factors outside the college and/or can occur between young people and vulnerable adults outside of these environments
- should be alert to the fact that young people and vulnerable adults are at risk of abuse or exploitation in situations outside the home.
- are alert to signs and indicators of possible abuse and neglect or at risk of harm and be able to identify vulnerable learners and take action to keep them safe. Information or concerns about children will be shared with the safeguarding team where it includes those:
 - o who need a social worker and may be experiencing abuse or neglect
 - o requiring mental health support
 - o who may benefit from early help
 - o where there is a radicalisation concern
 - o where a crime may have been committed
 - o where there is the potential for child-on-child abuse/child on child sexual harassment or sexual violence.

7.2. All BN1 Arts Staff will also:

- be clear as to the College's policy and procedures with regard to child-on-child abuse, children missing education, children who have low and persistent absence, and children requiring mental health support. Available at BN1Arts.co.uk
- record concerns appropriately and in a timely manner
- be aware of the need to raise to the senior leadership team any concerns they have about safeguarding practices within their college
- have the skills, knowledge and understanding to keep looked after children, previously looked after children, and vulnerable children and young people safe
- be aware of signs of abuse or neglect and the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND) and those with relevant health conditions
- be aware of their legal responsibility to report cases of FGM to the police. Whilst all staff should speak to the DSL or DDSL about any concerns about female genital mutilation (FGM), there

is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police (KCSIE 2023)

- report their concerns to the DSL if they think a student may be at risk of radicalisation or involvement in terrorism
- be aware that up skirting is now a criminal offence
- be aware of the College whistleblowing procedures and policy
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children and young people, including where families may be facing challenging circumstances
- maintain an attitude of 'it could happen here' where safeguarding is concerned.

8. Managing Allegations against Staff

8.1. We acknowledge that a student may make an allegation against a member of staff. If such an allegation is made which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the College Principal and DSL, unless the allegation concerns the College Principal and /or DSL, in which case a member of the senior leadership team will be informed immediately.

8.2. The College Principal and DSL on all such occasions will discuss the content of the allegation with LADO, prior to undertaking any investigation.

8.3. A Case Manager will be assigned to investigate and will be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.

8.4. If a member of staff suspects that a student is being abused by staff of the College, a report should be made in confidence to the DSL and College Principal, who will liaise in the strictest of confidence with the senior leadership team.

8.5. BN1 Arts will follow the DfE and Local Authority procedures for managing allegations against staff.

9. Whistleblowing

9.1. BN1 Arts recognises that students cannot be expected to raise concerns in an environment

where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the Institute's confidential reporting (whistleblowing) policy.

9.2. Whistleblowing concerns should be raised with the College Principal.

9.3. Whistleblowing concerns about the College Principal should be raised with a member of the senior leadership team.

9.4. Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC whistleblowing helpline](#).

10. Procedure Guidelines for Dealing with Disclosures & Reporting Concerns

10.1. Any suspicion, allegation or incident of abuse must be reported to a member of the Safeguarding Team. If any member of staff has any concerns about a student they consider to be suffering or to be at risk of suffering significant harm, he/she must immediately contact a member of the Safeguarding Team.

10.2. Staff should not:

- Promise confidentiality.
- Ask leading questions.
- Criticise or give their views.

10.3. The staff member to whom a disclosure is made should make a full and careful written record of the alleged abuse. This should be done immediately or as soon as possible thereafter and passed to a Safeguarding Officer. The record must be kept secure and confidential. The relevant information should include:

- The date and time the allegation was made.
- Staff name and the names of others present.
- The name of the person making the allegation and, where different, the name of the child who has allegedly been abused.
- A description of any injuries observed.
- An account of the allegation.
- Any telephone report must be confirmed in writing to the Social Services department within 24 hours. The confirmation may be handwritten, posted or faxed, but a copy must be kept securely on file.
- The DSL or, in their absence, DDSL, shall retain a copy of the written records and any other

relevant material. These will be kept securely at all times, separate from the main student file.

10.4. Allegations against staff will be referred to the College Principal.

10.5. A member of the Safeguarding Team will discuss the situation with Social Services if appropriate. This will include advice and discussion as to whether to make a formal referral for child protection. There should be no contact with parents/carers by staff – any contact must have the consent of the person disclosing and be referred via Children's Services.

11. Types of Concerns

Staff should ONLY discuss these types of concerns with a member of the Safeguarding Team:

- A student discloses that they have been sexually abused in the past or is now being sexually abused.
- A student discloses self-harm, eating disorders, or suicidal thoughts or attempts.
- A student has been physically abused in the past or is now being physically abused.
- Staff are told by another student or parent/carer that they know a student is being abused.
- Staff see bruises, cuts, burns or unexplained injuries that lead to suspicion of a physical injury.
- If they have any concerns about a student's welfare or safety.

12. Neglect or Emotional Abuse

12.1. Members of staff often find it more difficult to know what to pass on in these circumstances. Any concerns or worries about a student's welfare should be discussed with a member of the Safeguarding Team.

12.2. It is important that staff alert the DSL or, in their absence, the DDSL of concerns including, but not limited to:

- Lack of adequate food, clothes or hygiene.
- Loss of weight.

- Increase in apathy.
- Excessive attention-seeking behaviour.
- Unduly aggressive behaviour.
- Self-depreciation (I'm stupid, ugly, worthless, etc).
- Extremes of passivity or aggression.
- Constant tiredness.
- Untreated medical or hygiene problems.
- No social relationships.

13. Suspected abuse by another student

13.1. Any form of inappropriate behavior (such as bullying and harassment) towards students will be dealt with under the BN1 Arts Staff/Student Disciplinary Procedure.

13.2. KCSIE requires staff to be vigilant around issues associated with sexual violence and sexual harassment between children in colleges. It also provided clarity of managing child-on-child abuse and additionally physical relationships between children.

14. Children Missing from Education

14.1. A child going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risk of them going missing in future.

14.2. BN1 Arts must notify the Local Authority of any student who fails to attend regularly after making reasonable enquiries or has been absent without approval for a continuous period of 5 days or more.

14.3. BN1 Arts must also notify the Local Authority of any student who is to be withdrawn because:

- They have been taken out of school by their parents and is being educated outside the school system (e.g., home education)
- They have ceased to attend and no longer live within a reasonable distance (e.g. moved within the city, within the country or moved abroad but failed to notify of the change)
- Displaced as a result of a crisis e.g., domestic violence or homelessness

14.4. To ensure compliance with the above, the Institute will:

- Hold two or more emergency contact numbers for each student.
- Attendance monitoring will be conducted closely with the DSL and checked on an individual basis to ensure the safety of each student
- Demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of students that would be considered 'missing'.

15. Procedure and guidelines for student productions, film shoots and projects

15.1. Risk Assessment

15.1.1. An appropriate risk assessment should be made by the student production in every case, whether or not a child's participation is to be licensed by a local authority, to minimise the risks to children in relation to the activities they will be carrying out.

15.1.2. The risk assessment must pay particular attention to:

- the age, immaturity and inexperience of the child, and the consequential lack of risk awareness
- any exposure to chemical, biological, or physical hazard within the location
- the nature and layout of locations, and additional facilities
- the type of equipment and tools which the child is likely to come into contact with.

15.1.3. The following should be already considered as part of normal planning and risk assessing, although closer consideration should be applied where children are involved:

- First aid arrangements
- Rest areas, toilet facilities, washing facilities and refreshment supplies
- Emergency telephone numbers for children are to be retained by staff and student producers
- Restrictions, terms, or conditions applied by the child's license
- Arrangements are in place for child chaperones, whether that be a parent/guardian, or a fully licensed professional chaperone
- Travel arrangements for children, to and from locations, are considered
- Talent Release Forms are signed by the child's parent
- Protection against inclement weather

15.2. Working Hours

15.2.1. The rules for working hours, rest breaks and meal breaks vary depending on the local government body which has issued the child's license. It should be noted that time spent in costume and make-up, as well as rehearsal periods, count as work. Working hours are counted from the moment a child arrives at the place of performance or rehearsal.

- 15.2.2.** Student producers are responsible for logging child working hours, breaks, arrival and wrap times. This record, along with an accident report (if applicable), must be kept for 6 months following the child completing the production process. Authorities may ask to see this documentation.
- 15.2.3.** Legislation states that a child taking part in a performance must not be employed in any other employment on the day of that performance, or the following day.
- 15.2.4.** A child must have an overnight minimum break of 12 hours between attendance at a place of performance or rehearsal.

15.3. Child Licensing

- 15.3.1.** A license will ordinarily be required where a child is performing, or participating in a production where the activity is manipulated or directed for the purpose of entertainment.
- 15.3.2.** Chaperones are employed in a professional capacity to act in 'loco parentis', ensuring the wellbeing of any child working on a production, and to monitor compliance with the performance regulations and the terms of any child licenses.
- 15.3.3.** Detailed guidance can be found in **[A Guide to Child Performance Licensing \(2020\)](#)**

15.4. Privacy and Consent Online

- 15.4.1.** Student producers are required to use a parental permission form to obtain consent for a child to be photographed and for the photographs to be used for promotional purposes. The form must clearly state the purpose(s) for which the photograph(s) will be used. Student producers should also obtain the child's permission to use their image.
- 15.4.2.** Children's names must not be used in photograph captions. If a child is named, avoid using the photograph. Only use images of children in suitable clothing to reduce the risk of inappropriate use. Some activities, for example swimming, present a much greater risk of potential misuse.
- 15.4.3.** Images or video recordings of children must be kept securely. Hard copies of images should be kept in a locked drawer and electronic images should be in a protected folder with restricted access.
- 15.4.4.** Avoid using any personal equipment to take photos and recordings of children and use only cameras or devices belonging to the Institute.

16. Record Keeping

- 16.1.** Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will create a record on CPOMS as soon as possible (within the hour, if possible) recording exactly what was said, using the child's own words as far as possible.

16.2. All records of a child protection nature will be flagged to the DSL including case conference or core group minutes and written records of any concerns. Child protection records are kept securely and transferred in a safe and timely manner when a child moves school and a confirmation receipt obtained.

16.3. The DSL will maintain and regularly audit child protection records and ensure that each stand-alone file includes a chronology of significant events.

17. Information Sharing & Confidentiality

17.1. BN1 Arts recognises that all matters relating to child protection are confidential and is fully aware of the obligations which the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) places on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

17.2. The College Principal, DSL or DDSL will disclose any information about a student to other members of staff on a need-to-know basis only.

17.3. All staff must have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

17.4. All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children/vulnerable young adults. All staff must be aware that they cannot promise a child/vulnerable young adult to keep secrets which might compromise their safety or well-being.

17.5. Wherever possible DSLs and DDSLs will follow the principles of the GDPR, however this should not be a barrier to the effective and timely communication of information related to

safeguarding information. Safeguarding information is treated as the 'special category personal data and allows for storage and sharing of sensitive and personal information through secure means.

17.6. KCSIE states that: *"The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children"*.

17.7. Further guidance is available on page 19 of the Government's [Working Together to Safeguard Children](#) guidance, September 2024.

18. Monitoring & Evaluation

18.1. It will be the responsibility of the Academic and Quality committee, chaired by a nominated member of the Senior Leadership Team, to review and monitor safeguarding policies and procedures.

18.2. Within each college, monitoring and evaluation will be carried out by the DSL or, in their absence, the DDSL to review and monitor the procedures and to seek the advice of the Area Child Protection Committee (ACPC) and local authority Social Services department and to bring about a change in procedures and guidelines if necessary

18.3. BN1 Arts Safeguarding Policies and procedures will be monitored and evaluated by:

- Completion of an annual safeguarding audit;
- Student surveys and questionnaires;
- Discussions with students and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the single central record of recruitment checks;
- Monitoring of logs of bullying/racist/behaviour incidents;
- Supervision of staff involved in child protection.

19. Prevent

19.1 The Counter Terrorism & Security Act 2015 places a duty on all Relevant Further Education Bodies (RFEB) to have due regard to the need to prevent people from being drawn into terrorism. This legislation is given specific statutory force through the Prevent Duty guidance for Further Education (FE)

19.2 The underlying considerations adopted by BN1 Arts in implementing the Prevent Duty are:

- a commitment to the safety and wellbeing of our staff and students and all who interact with BN1 Arts, including not being victims of, or complicit with any activities linked to radicalisation.
 - upholding the legislative requirements and championing the spirit of academic freedom and freedom of speech within the law and with the appropriate obligations and responsibilities arising from such freedoms (see also section 2.5).
 - that the requirements described in this Policy are implemented in a proportionate and risk-based manner.

19.3 The legal definition of terrorism as defined in the Terrorism Act 2000 defines it as “the use or threat of action which involves serious damage to property; or endangers a person’s life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause.”

19.4 Terrorism may take the form of extremist behaviour and acts. The statutory Prevent Duty Guidance 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 and calls for the death of members of our armed forces, whether in this country or overseas”.

19.5 In accordance with this definition, BN1 Arts considers that extremist ideologies, and those who express them, undermine the principles of freedom of speech and academic freedom. Freedom of speech and academic freedom, as separate but interrelated liberties, are key features of student life.

Arrangements to Deliver the Prevent Duty

19.6 Governance

19.6.1 BN1 Arts Senior Leadership Team has a statutory responsibility to ensure the organisation satisfies the requirements of the Prevent Duty, with leadership and implementation delegated to the Academic Director & Centre Managers for Prevent-related matters.

19.6.2 This Policy and its associated procedures are kept under review by the BN1 Arts Academic & Quality Committee, with ultimate responsibility for ensuring compliance with the Prevent Duty resting with the BN1 Arts Senior Leadership Team.

19.7 Risk Assessment & Action Plan

19.7.1 BN1 Arts continually assesses where and how its students might be at risk of being drawn into terrorism. BN1 Arts manages risk by looking at institutional policies regarding its College and student welfare, including equality and diversity and the safety and welfare of students and staff. The risk assessment also assesses the physical management of the BN1 Arts estates, as well as policies and procedures for events held by staff, students or visitors and relationships with external bodies and community groups who may use premises, or work in partnership with the organisation.

19.7.2 The Risk Assessment is kept under review by the BN1 Arts Senior Leadership Team and reviewed annually to ensure relevance. This includes proposed actions which BN1 Arts will take to mitigate these risks.

19.8 External and Visiting Speakers and Events

19.8.1 BN1 Arts has robust procedures for approving External and Visiting Speakers and Events. The External Guests Approval Procedure sets out the arrangements for managing in-College events, and the use of premises. The procedure is set within the context of the statutory responsibility of BN1 Arts to secure freedom of speech.

A risk-based approach to the assessment of events will be taken and this may require modification of adjustments to the content of or arrangements for events to mitigate risks in respect of the Prevent Duty. Whilst, in exceptional circumstances only, the right is reserved by BN1 Arts to prohibit events where speakers promote or seek to incite hatred of, or violence against others.

19.9 Staff Training

19.9.1 BN1 Arts will develop and make accessible training materials available to academic and professional services staff outlining the requirements of the Prevent Duty, including guidance and support provided at a national level to support the delivery of training within RFEs. Training will also be delivered to appropriate staff to aid awareness of the Prevent Duty and its requirements, the arrangements that BN1 Arts has in place to seek to prevent staff or students from being drawn into terrorism or victims of it. This will include training appropriate members of staff to understand the factors that make people support terrorist ideologies or engage in terrorist-related activity, and recognise vulnerability to being drawn into terrorism,

and be aware of what action to take in response.

19.9.2 Compliance with Prevent Duty will be logged on the SCR

19.10 Social Media

19.10.1 BN1 Arts has a statutory obligation under the Prevent Duty to ensure that social media is not used to promote extremist material or activities which may place people at risk of being drawn into terrorism; therefore, its social media channels are monitored regularly, and action will be taken to address any misuse of social media which is in breach of this policy. See also the Institute's [Online Learning Policy](#).

19.11 Student Engagement

19.11.1 BN1 ARTS is committed to engaging with its students in relation to Prevent Duty requirements as detailed in the [BN1 Arts Prevent Risk register available at BN1Arts.co.uk](#)

19.12 Safeguarding & Reporting

19.12.1 The implementation of the Prevent Duty is not to challenge or re-shape the current relationship between staff and students, or between any other stakeholders who make up the extended BN1 Arts community. Instead, the focus is that, in the rare event that a member of our community – be it a staff member, student, or anyone else connected with the organisation – has a serious concern that someone else in our community is potentially being drawn into violent extremism or terrorism, they know where to seek advice and what to do with that concern.

Statutory Responsibilities

19.13 The underlying considerations adopted by the Institute in implementing the Prevent Duty are:

19.3.1 a commitment to the safety and wellbeing of our staff and students and all who interact with the Institute, including not being victims of, or complicit with any activities linked to radicalisation.

19.3.2 upholding the legislative requirements and championing the spirit of academic freedom and freedom of speech within the law and with the appropriate obligations and responsibilities arising from such freedoms (see also section 2.5).

19.3.3 that the requirements described in this Policy are implemented in a proportionate and risk-based manner.

19.14 The legal definition of terrorism as defined in the Terrorism Act 2000 defines it as “the use or

threat of action which involves serious damage to property; or endangers a person's life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause."

19.15 Terrorism may take the form of extremist behaviour and acts. The statutory Prevent Duty Guidance 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 and calls for the death of members of our armed forces, whether in this country or overseas".

20. In accordance with this definition, BN1 Arts considers that extremist ideologies, and those who express them, undermine the principles of freedom of speech and academic freedom. Freedom of speech and academic freedom, as separate but interrelated liberties, are key features of student life. The Institute has a separate Freedom of Speech Policy which sets out the legal obligations, rights and responsibilities related to preserving this freedom.

21. Looked after young people

At BN1 Arts we recognise that sometimes young people with experiences of being in care want or need a little extra support. We believe that all young people have the right to an education, regardless of what is happening at home. We are committed to ensuring our looked after young people and care leavers receive the best opportunities and support to succeed and work closely with local partnerships including local authorities. Our pastoral FE Team includes people who are here to help and support your move from school to College. Our team will work with you to identify ways we can assist you on a 1-to-1 basis, addressing any individual needs and concerns you may have. On a need to know basis, certain staff will be made aware that a young person is, or has been, in care, but they will not be told any further details unless they are part of your immediate support team. We can also work with your Progress Coach and your lecturers to ensure they are sensitive to your needs.