



# Child Protection and Safeguarding

Date policy last reviewed: 07.03.2026

Signed by:

Barbara Clogg                      Chair of Trustees                      Date: 09.03.2026

A handwritten signature in black ink, appearing to read 'A. Clogg', written over a horizontal line.

Interim CEO                      Date: 07.03.2026

## Important Numbers

Safeguarding Contacts	Name	Work	Tel. No.
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		No.	
<b>Designated Safeguarding Lead</b>	Julia Moor	07870105317	
<b>Deputy Designated Safeguarding Lead</b>	Katie Arrowsmith	07575712429	
<b>Deputy Designated Safeguarding Lead</b>	Trinity Horn	07575712918	
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<b>Nominated Trustee for Safeguarding</b>	Barbara Grant	07522070688	
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<b>NSPCC Whistle-blowing Helpline</b>	0800 028 0285		

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## Statement of intent

Skills Bridge is committed to safeguarding and promoting the physical, mental and emotional welfare of every learner, both inside and outside of Skills Bridge premises. We implement a whole-Skills Bridge preventative approach to managing safeguarding concerns, ensuring that the wellbeing of learners is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the board of trustees, the CEO, the Skills Bridge Lead and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of abuse, and know to refer concerns to the DSL.
- Teaching learners how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any learner that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children and young people.
- Ensuring that the Skills Bridge Lead and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL is Christopher Murray. In the absence of the DSL, child protection matters will be dealt with by one of the deputy DSLs, Jade Wilson, Katie Arrowsmith and Trinity Horn.

## Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a Skills Bridge.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, Skills Bridges, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in Skills Bridge with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK

		GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout Skills Bridge.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for learners who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the learner.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring

	Sexual Abuse	Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out Skills Bridges and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which learners learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all learners. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and

		instructors, and volunteers who attend Skills Bridge in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all Skills Bridges maintaining oversight and coordinating the implementation of Skills Bridge's special educational needs policy and provision of education to learners with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a Skills Bridge.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual Skills Bridge head	Virtual Skills Bridge heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

## Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

The terms “**Young People**” and “**Young Person**” refer to anyone over the age of 18.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

- Providing help and support to meet the needs of learners as soon as problems emerge.
- Protecting learners from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of learners’ mental and physical health or development.
- Ensuring that learners grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all learners to have the best outcomes.

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of Skills Bridge. Sexual harassment is likely to violate a learner’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion, and threats.

For the purposes of this policy, “**upskirting**” refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including learners and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the “**consensual and non-consensual sharing of nude and semi-nude images and/or videos**”, colloquially known as “**sexting**”, and collectively called “**youth-produced sexual imagery**” is defined as the creation of sexually explicit content by a person under the age of 18 that is shared with another person under the age of 18. This definition does not cover persons under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

“**Deep fakes**” and “**deep nudes**” refer to digitally manipulated and AI-generated nudes and semi-nudes.

For the purposes of this policy, “**indecent imagery**” is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Indecent images also include indecent “**pseudo-images**”, which are images have been created or manipulated using computer software and/or AI.

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of a child or young person which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children and young people of all forms of domestic abuse. Children and young people may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children and young people may be abused by one or multiple adults or other children.

For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child or young person.

For the purposes of this policy, “**emotional abuse**” is defined as the persistent emotional maltreatment of a child or young person such as to cause severe and adverse effects on the child’s or young person’s emotional development. This may involve conveying to a child or young person that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child or young person the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children or young people, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child or young person from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child or young person to frequently feel frightened or in danger, or the exploitation or corruption of children or young people. Some level of emotional abuse is involved in all types of maltreatment of a child or young person, but it may also occur alone.

For the purposes of this policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, and regardless of whether the child or young person is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children or young people in looking at, or in the production of, sexual images, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child’s or young person’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s or young person’s health or development. This may involve a parent or carer failing to provide a child or young person with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child or young person from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s or young person’s basic emotional needs.

## 1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

### **Legislation**

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (Skills Bridge Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

### **Statutory guidance**

- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE 'Working Together to Safeguard Children 2023'
- DfE 'Disqualification under the Childcare Act 2006'
- DfE 'Keeping children safe in education 2025'
- DfE 'Working together to improve Skills Bridge attendance'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'

- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

### **Non-statutory guidance**

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Child sexual exploitation'
- DfE 'Filtering and monitoring standards for Skills Bridges and colleges'
- DfE 'Information sharing'
- DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Teachers' Standards'
- DfE 'Recruit teachers from overseas'
- DfE 'Meeting digital and technology standards in Skills Bridges and colleges'
- Department of Health and Social Care 'Virginity testing and hymenoplasty: multi-agency guidance'

This policy operates in conjunction with the following Skills Bridge policies and documents:

- Children Missing from Education Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy
- Child-on-child Abuse Policy
- Anti-bullying Policy
- Suspension and Exclusion Policy
- Online Safety Policy
- Cyber-security Policy
- Learners' Personal Electronic Devices Policy
- Staff ICT and Electronic Devices Policy
- Data Protection Policy
- Photography and Images Policy
- Records Management Policy
- LAC Policy
- Whistleblowing Policy

- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Social, Emotional and Mental Health (SEMH) Policy
- Behaviour Policy
- Low-level Safeguarding Concerns Policy
- Youth-produced Sexual Imagery (YPSI) Policy
- Staff Disqualification Declaration Form
- Reporting Safeguarding Concerns Flowchart

## 2. Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the learner.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which learners can learn.
- Be prepared to identify learners who may benefit from early help.
- Be aware of Skills Bridge's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children and young people, in collaboration with the DSL.

- Be aware of and understand the procedure to follow in the event that a child or young person confides they are being abused, exploited or neglected.
- Be aware that a learner may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all learners feel listened to and understood.
- Empower learners and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put learners at risk of harm.
- Be aware of behaviours that could potentially be a sign that a learner may be at risk of harm.

Tutors, including the Skills Bridge Lead and CEO, have a responsibility to:

- Safeguard learners' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The board of trustees has a duty to:

- Take strategic leadership responsibility for Skills Bridge's safeguarding arrangements.
- Ensure that Skills Bridge complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in Skills Bridge are effective and comply with the law at all times.
- Guarantee that Skills Bridge contributes to multi-agency working in line with the statutory guidance ['Working Together to Safeguard Children'](#).
- Confirm that Skills Bridge's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in Skills Bridge's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.

- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children and young people read either Part one or Annex A of KCSIE. **NB:** Individual centres assess which guidance will be most effective for their staff to safeguard and promote the welfare of children and young people.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children and young people.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description to provide support to Skills Bridge Deputy DSLs with the Skills Bridge DSL is absent.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-Skills Bridge approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's or young person's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place for children and young people to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the board of trustees is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the CEO or another trustee.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of Skills Bridge's local safeguarding arrangements, including the board of trustees itself, the SLT and DSL.
- Make sure that learners are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children and young people, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support learners to be themselves at Skills Bridge, e.g. if they are LGBTQ+.

- Ensure Skills Bridge has clear systems and processes in place for identifying possible mental health problems in learners, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Have overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for Skills Bridges are being met
- Ensure that all trustees receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle learners' allegations against other learners.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of learners and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse or young person-on-young person abuse.
- Guarantee that there are systems in place for learners to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated tutor to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated tutor works with the VSH to discuss how the learner premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the learner's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for learners who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.

- Ensure that all members of the board of trustees have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.
- Ensure that appropriate arrangements are in place to keep children and young people safe where Skills Bridge facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children or young people have appropriate DBS checks.
- Ensure that safeguarding requirements are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Establish robust health and safety and emergency evacuation procedures.

The CEO and Skills Bridge Lead have a duty to:

- Ensure that the policies and procedures adopted by the board of trustees, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Ensure that staff implement appropriate filters and monitoring of online material.
- Provide staff with the appropriate policies and information upon induction.
- Ensure that Skills Bridge practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent Skills Bridge Standards) (England) Regulations 2014 as amended.
- Ensure that Skills Bridge carries out all necessary checks on the suitability of people who serve as members and/or on the board of trustees.
- Ensure that, where Skills Bridge ceases to use the services of any person because that person was considered unsuitable to work with children and young people, a prompt and detailed report is made to the DBS within one month.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child and young person welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children and young people, and/or support other staff to do so.

- During term time, be available during Skills Bridge hours for staff to discuss any safeguarding concerns. Available is defined as face to face, through phone or video call conversation
- Arrange, alongside Skills Bridge, adequate and appropriate cover for any activities outside of Skills Bridge hours or terms.
- Refer cases:
  - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the CEO to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the CEO and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at Skills Bridge. This includes:
  - Ensuring that Skills Bridge knows which learners have or had a social worker.
  - Understanding the academic progress and attainment of these learners.
  - Maintaining a culture of high aspirations for these learners.

- Supporting tutors to provide additional academic support or reasonable adjustments to help these learners reach their potential.
  - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these learners are experiencing with tutors and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
  - Ensure that a learner's child protection file is transferred as soon as possible, and within five days, when transferring to a new Skills Bridge, and consider any additional information that should be shared.
  - Ensure each member of staff has access to and understands Skills Bridge's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
  - Work with the board of trustees to ensure Skills Bridge's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
  - Ensure Skills Bridge's Child Protection and Safeguarding Policy is available publicly, and parents are aware that Skills Bridge may make referrals for suspected cases of abuse or neglect, as well as the role Skills Bridge plays in these referrals.
  - Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
  - Undergo training, and update this training at least every two years.
  - Obtain access to resources and attend any relevant or refresher training courses.
  - Encourage a culture of listening to children and young people and taking account of their wishes and feelings; this includes understanding the difficulties learners may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
  - Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
  - Understand the importance of information sharing, including within Skills Bridge, with other Skills Bridges, and with the safeguarding partners, other agencies, organisations and practitioners.
  - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
  - Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

The designated tutor has a responsibility for promoting the educational achievement of LAC and PLAC, and for children and young people who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

### 3. Multi-agency working

Skills Bridge contributes to multi-agency working as part of its statutory duty. Skills Bridge is aware of and will follow the local safeguarding arrangements.

Skills Bridge will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once Skills Bridge is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

Skills Bridge will develop trusting relationships between families and agencies to protect the welfare of its learners, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, Skills Bridge will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

Skills Bridge will also be mindful of the importance of inter-agency working in identifying and preventing CSE.

Skills Bridge will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on learners' needs.
- Celebrating inclusivity and diversity and challenging discrimination.
- Mutually and constructively challenging other's assumptions in a respectful manner.

#### Information sharing

Skills Bridge recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet learners' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on Skills Bridges to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the learner being placed at risk of harm.

Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of learners. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

## 4. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's or young person's life. Skills Bridge will be proactive in ensuring that every learner is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with learners to identify concerns as early as possible.

Any learner may benefit from early help, but in particular, staff will be alert to the potential need for early help for learners who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from Skills Bridge, alternative provision or a PRU.

Skills Bridge will not limit its support to learners affected by the above and will be mindful of a variety of additional circumstances in which learners may benefit from early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from Skills Bridge, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the learner's situation is not improving or is worsening.

## 5. Abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children and young people can be at risk of harm inside and outside of Skills Bridge, inside and outside of home, in an institutional or community setting by those known to them or by others, and online. Staff will also be aware that learners can be affected by seeing, hearing or experiencing the effects of abuse.

Skills Bridge will recognise that abuse or neglect of a child or young person may occur through the infliction of harm or through the failure to act to prevent harm. Skills Bridge will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

Skills Bridge will pay particular attention to the effects of domestic abuse on children and young people, recognising that harm may arise not only when children and young people are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all learners.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside Skills Bridge and/or can occur between children and young people outside of these environments; this includes being aware that learners can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a learner being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

## 6. Specific safeguarding issues

There are certain specific safeguarding issues that can put children and young people at risk of harm – staff will be aware of these issues.

[Appendix A](#) of this policy sets out details about specific safeguarding issues that learners may experience and outlines specific actions that would be taken in relation to individual issues.

## 7. Child-on-child abuse

For the purposes of this policy, “child-on-child abuse” is defined as abuse between children between young people.

Skills Bridge has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy’s statement of intent.

All staff will be aware that child-on-child abuse can occur between learners of any age and gender, both inside and outside of Skills Bridge, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

Some children and young people may be particularly vulnerable and have an increased risk of abuse. Skills Bridge will recognise that children and young people with SEND or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children and young people. Skills Bridge will consider extra pastoral support for those children and young people.

All learners have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. Skills Bridge will give special consideration to, amongst others, children and young people who:

- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to Skills Bridge's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Learners will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Learners will also be reassured that they will be taken seriously, be supported, and kept safe.

Skills Bridge's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in Skills Bridge's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

## 8. Online safety and personal electronic devices

Skills Bridge will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all learners will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Learner attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a learner's online activity.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- Content - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
- Contact - Training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- Conduct - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, or receiving explicit images, the distribution of other explicit material, and instances of online bullying.
- Commerce - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams.

Any concerns that learners or staff may be at risk will be reported promptly to the Anti-Phishing Working Group or through appropriate safeguarding channels.

Skills Bridge will ensure that appropriate filtering systems are in place on Skills Bridge devices and Skills Bridge networks to prevent children and young people accessing inappropriate material, in accordance with Skills Bridge's Cyber-security Policy. The appropriateness of Skills Bridge's filters and monitoring systems will be informed by the Filtering and monitoring standards, the Cyber security standards for Skills Bridges and colleges, and the risk assessment required by the Prevent Duty. Skills Bridge will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what learners can be taught online. Skills Bridge will also ensure that it meets the [filtering and monitoring standards](#) published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding Skills Bridge's approach to online safety can be found in the Online Safety Policy.

### Communicating with parents

As part of the usual communication with parents, Skills Bridge will reinforce the importance of learners being safe online and inform parents that they will find it helpful to understand what systems Skills Bridge uses to filter and monitor internet use.

Skills Bridge will also make it clear to parents what their children are being asked to do online for Skills Bridge.

### Reviewing online safety

Skills Bridge will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by learners.

### Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and learners is closely monitored by Skills Bridge, in accordance with the Staff ICT and Electronic Devices Policy and Learners' Personal Electronic Devices Policy. Staff cannot not take pictures of or store photos of learners with their own devices.

Photographs and videos of learners will be carefully planned before any activity with particular regard to consent and adhering to Skills Bridge's Data Protection Policy and Photography and Images Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve learners who are LAC, adopted learners, or learners for whom there are security concerns, the CEO will liaise with the DSL to determine the steps involved. The DSL will, in known cases of learners who are LAC or who have been adopted, liaise with the learners' social workers, carers or adoptive parents to assess the needs and risks associated with the learners.

Staff will report any concerns about learners' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

## Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. “Operating equipment” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by Skills Bridge. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

## 9. Consensual and non-consensual sharing of indecent images and videos

Skills Bridge will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as “sexting” or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the learner, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in Skills Bridge community, including understanding motivations, assessing risks posed to learners depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that learners are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected learners and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

Skills Bridge’s full response to incidents of consensual and non-consensual sharing of indecent images and videos can be found in the Youth-produced Sexual Imagery Policy, including the appropriate reporting routes for both staff and learners.

## 10. Context of safeguarding incidents

Safeguarding incidents can occur outside of Skills Bridge and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of learners’ behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. Skills Bridge will provide as much contextual information as possible when making referrals to CSCS.

## 11. Learners potentially at greater risk of harm

Skills Bridge recognises that some groups of learners can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of learners. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

### Learners who need social workers

Learners may need social workers due to safeguarding or welfare needs. These needs can leave learners vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a learner has a social worker in order to make decisions in the best interests of the learner's safety, welfare, and educational outcomes.

Where a learner needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

### Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with Skills Bridge Attendance (Learner Registration) (England) Regulations 2024, Skills Bridge will inform the LA of all deletions from the admissions register when a learner is taken off roll.

Where a parent has expressed their intention to remove a learner from Skills Bridge for EHE, Skills Bridge, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the learner has SEND, is vulnerable, and/or has a social worker.

### LAC and PLAC

Children and young people most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The board of trustees will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the learner.

The DSL will be provided with the necessary details of learners' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in Skills Bridge's LAC Policy.

## Learners with SEND

When managing safeguarding in relation to learners with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the learner's disability without further exploration; however, it should never be assumed that a learner's indicators relate only to their disability
- Learners with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

## LGBTQ+ learners

The fact that a learner may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ learners can be targeted by other individuals. Staff will also be aware that, in some cases, a learner who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as learners who identify as LGBTQ+.

Staff will also be aware that the risks to these learners can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these learners and provide a safe space for them to speak out and share any concerns they have.

## Learners requiring mental health support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a learner has suffered, or is at risk of suffering, abuse, neglect or exploitation.

## 12. Use of Skills Bridge premises for non-Skills Bridge activities

Where the board of trustees hires or rents out Skills Bridge facilities or Skills Bridge premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep learners safe. Skills Bridge will refer to the DfE's [guidance](#) on keeping children and young people safe in out-of-Skills Bridge settings in these circumstances.

Where the board of trustees provides the activities under the direct supervision or management of Skills Bridge staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the board of trustees will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The board of trustees will also ensure that there are arrangements in place to liaise with Skills Bridge on these matters where appropriate. The board of trustees will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

## Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at Skills Bridge, e.g. charities or companies, will work in collaboration with Skills Bridge to effectively safeguard learners and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of learners. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

## 13. Alternative provision

Skills Bridge will remain responsible for a learner's welfare during their time at an alternative provider. When placing a learner with an alternative provider, Skills Bridge will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the learner's needs.

Those responsible for the commissioning of alternative provision will be aware that learners in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these learners may be vulnerable to.

## 14. Work experience

When a learner is sent on work experience, Skills Bridge will ensure that the provider has appropriate safeguarding policies and procedures in place. Where Skills Bridge has learners conduct work experience at Skills Bridge, an enhanced DBS check will be obtained if the learner is over the age of 16.

## 15. Homestay exchange visits

### Skills Bridge-arranged homestays in UK

Where Skills Bridge is arranging for a visiting child or young person to be provided with care and accommodation in the UK in the home of a family to which the child or young person is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, Skills Bridge is the regulated activity provider; therefore, Skills Bridge will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, Skills Bridge will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, Skills Bridge will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

### Skills Bridge-arranged homestays abroad

Skills Bridge will liaise with partner providers to discuss and agree the arrangements in place for the visit. Skills Bridge will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. Skills Bridge will use its professional judgement to assess whether the

arrangements are appropriate and sufficient to safeguard every child or young person involved in the exchange. Learners will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

### Privately arranged homestays

Where a parent or learner arranges their own homestay, this is a private arrangement and Skills Bridge is not the regulated activity provider.

### Private fostering

Where a period of UK homestay lasts 28 days or more for a child or young person aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where Skills Bridge becomes aware of a learner being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

## 16. Concerns about learners

If a member of staff has any concern about a learner's welfare, or a learner has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

Staff will be aware that learners may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a learner.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the [Communication and confidentiality](#) section of this policy.

Staff members will report concerns as soon as possible and follow up any verbal reports with a written report. The 'Significant Conversation/Event' form is available on the Skills Bridge drive and all staff members are aware how to access this.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs with the matter. If a referral is made about a learner by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the learner. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the learner.

If early help is appropriate, the case will be kept under constant review. If the learner's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in [location](#).

If a learner is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a learner has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, Skills Bridge will ensure that the learner's wishes are always taken into account, and that there are systems available for learners to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the learner feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child or young person and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child or young person and family require in preventing needs escalating to a point where intervention would be needed.

Skills Bridge will consider whether a family group decision-making forum is appropriate to determine the help and support the family network can provide for a learner where concerns have been raised about their safety or wellbeing.

## 17. Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the learners involved. The DSL will work closely with the police to ensure Skills Bridge does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a learner has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

Skills Bridge will not wait for the start or outcome of an investigation before protecting the victim and other learners: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, Skills Bridge will consider referring the incident again if it is believed that the learner is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and Skills Bridge agrees with this decision, Skills Bridge will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the learner will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the learner or others at potential risk of harm. Skills Bridge will work closely with parents to ensure that the learner, as well as their family, understands the arrangements in place, such as in-Skills Bridge interventions, is effectively supported, and knows where they can access additional support.

## 18. Concerns about Skills Bridge safeguarding practices

Any concerns regarding the safeguarding practices at Skills Bridge will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff

member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

## 19. Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with Skills Bridge's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. Skills Bridge will ensure all allegations against staff, including those who are not employees of Skills Bridge, are dealt with appropriately and that Skills Bridge liaises with the relevant parties.

When managing allegations against staff, Skills Bridge will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child or young person, or may have harmed a child or young person.
- Committed or possibly committed a criminal offence against or related to a child or young person.
- Behaved towards a child or young person in a way that indicates they may pose a risk of harm to children or young people.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children or young people.

Low-level concerns will be handled in line with Skills Bridges' Low-level Safeguarding Concerns Policy.

## 20. Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within Skills Bridge and with other Skills Bridges on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care/social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with Skills Bridge data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, Skills Bridge will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, Skills Bridge will do all it can to protect the anonymity of the learners involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a learner, staff members will not promise the learner confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects learners from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the learners involved. Discussions with parents will not take place where they could potentially put a learner at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, Skills Bridge will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a learner is leaving Skills Bridge, the DSL will consider whether it is appropriate to share any information with the learner's new provider, in addition to the child protection file, that will allow the new provider to support the learner and arrange appropriate support for their arrival.

## 21. Safer recruitment

Skills Bridge's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children and young people.
- Regularly work in Skills Bridge at times when children and young people are on the premises.
- Regularly come into contact with children under 18 years of age

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The board of trustees will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all trustees, volunteers, and contractors.

## 22. Single central record (SCR)

Skills Bridge keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at Skills Bridge.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18

For agency and third-party supply staff, Skills Bridge will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks Skills Bridge would perform on any individual working in Skills Bridge or who will be providing education on Skills Bridge's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

Skills Bridge is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at Skills Bridge.

## 23. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a [termly](#) basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.

- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in Skills Bridge.

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, learners with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by learners with SEND.

## 24. Monitoring and review

This policy is reviewed at least annually by the DSL and the CEO. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is **31/08/2026**.

Any child protection incidents at Skills Bridge will be followed by a review of the safeguarding procedures within Skills Bridge and a prompt report to the board of trustees. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to Skills Bridge's procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:

- The DSL carries out an investigation as a priority and comply with any deadlines given
- The Chair of the Trustees reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
- Skills Bridge endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted

## Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that learners may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. [Domestic abuse](#)
2. [Homelessness](#)
3. [Children absent from education](#)
4. [Child abduction and community safety incidents](#)
5. [Child criminal exploitation \(CCE\)](#)
6. [Cyber-crime](#)
7. [Child sexual exploitation \(CSE\)](#)
8. [Modern slavery](#)
9. [FGM](#)
10. [Virginity testing and hymenoplasty](#)
11. [Forced marriage](#)
12. [Radicalisation](#)
13. [Learners with family members in prison](#)
14. [Learners required to give evidence in court](#)
15. [Mental health](#)
16. [Serious violence](#)
17. [Adult involvement in youth-produced sexual imagery](#)

### Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.

- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Skills Bridge will recognise the impact of domestic abuse on children and young people, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

## Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child or young person is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

## Children absent from education

A child or young person who is absent from Skills Bridge can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. Skills Bridge will ensure that the response to children or young people persistently being absent from education supports identifying such abuse and helps prevent the risk of learners becoming absent from education in the future. Staff will monitor learners that are absent from Skills Bridge, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy. Skills Bridge will inform the LA of any learner who fails to attend regularly or has been absent without Skills Bridge’s permission for a continuous period of 10 Skills Bridge days or more.

Skills Bridge will follow the DfE’s [guidance](#) on improving attendance where there is a need to work with children’s services due to Skills Bridge absences indicating safeguarding concerns.

## Admissions register

Learners are placed on the admissions register at the beginning of the first day that is agreed by Skills Bridge, or when Skills Bridge has been notified that the learner will first be attending. Skills Bridge will notify the LA within 5 days of when a learner’s name is added to the admissions register.

Skills Bridge will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each learner where possible. Staff will monitor learners who do not attend Skills Bridge on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies Skills Bridge that their child will live at a different address, Skills Bridge will record the following information on the admissions register:

- The full name of the parent with whom the learner will live
- The new address
- The date from when the learner will live at that address

If a parent notifies Skills Bridge that their child will be attending a different provider, or is already registered at a different provider, the following information will be recorded on the admissions register:

- The name of the new provider
- The date on which the learner first attended, or is due to attend, that provider

Where a learner moves to a new provider, Skills Bridge will use a secure internet system to securely transfer learners' data.

To ensure accurate data is collected to allow effective safeguarding, Skills Bridge will inform the LA of any learner who is going to be deleted from the admission register, in accordance with the Education (Learner Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of Skills Bridge by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend Skills Bridge, and no longer live within a reasonable distance of the premises.
- Have been certified by Skills Bridge's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory Skills Bridge age, and their parent has not indicated the intention to the learner continuing to attend Skills Bridge after ceasing to be of compulsory Skills Bridge age.
- Have been in custody for a period of more than four months due to a final court order and Skills Bridge does not reasonably believe they will be returning to Skills Bridge at the end of that period.
- Have been permanently excluded.

Skills Bridge will also remove a learner from the admissions register where Skills Bridge and LA has been unable to establish the learner's whereabouts after making reasonable enquiries into their attendance.

If a learner is to be removed from the admissions register, Skills Bridge will provide the LA with the following information:

- The full name of the learner
- The full name and address of any parent with whom the learner lives
- At least one telephone number of the parent with whom the learner lives
- The full name and address of the parent with whom the learner is going to live, and the date that the learner will start living there, if applicable
- The name of the learner's new Skills Bridge and the learner's expected start date there, if applicable

- The grounds for removal from the admissions register under regulation 8 of the Education (Learner Registration) (England) Regulations 2006 (as amended)

Skills Bridge will work with the LA to establish methods of making returns for learners back into Skills Bridge. Skills Bridge will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. Skills Bridge will also highlight any other necessary contextual information, including safeguarding concerns.

### Child abduction and community safety incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of Skills Bridge that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with learners.

Learners will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

### Child criminal exploitation (CCE)

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

Skills Bridge will recognise that learners involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. Skills Bridge will also recognise that learners of any gender are at risk of CCE.

Skills Bridge staff will be aware of the indicators that a learner is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children or young people involved in exploitation.

- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from Skills Bridge or education or not taking part.

### County lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children or young people to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, Skills Bridge staff will be aware of the specific indicators that a learner may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of learners with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a learner may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

### Cyber-crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.

- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring learners to the National Crime Agency's Cyber Choices programme.

### Child sexual exploitation (CSE)

For the purposes of this policy, "**child sexual exploitation**" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Skills Bridge will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the learner's immediate knowledge, e.g. through others sharing videos or images of them on social media. Skills Bridge will recognise that CSE can affect any learner who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes learners aged 16 and above who can legally consent to sexual activity. Skills Bridge will also recognise that learners may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

Skills Bridge staff will be aware of the key indicators that a learner is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children or young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from Skills Bridge or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with Skills Bridge's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. Skills Bridge will cooperate as needed.

## Modern slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a learner may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

## FGM

For the purposes of this policy, “**FGM**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a learner being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. Skills Bridge’s procedures relating to managing cases of FGM and protecting learners will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a learner under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine learners, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that learners may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the learner. It is important to note that the learner may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a learner may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The learner coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a ‘special procedure’ or a ceremony to ‘become a woman’.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.

- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the learner:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from Skills Bridge, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called “‘**honour-based’ abuse (HBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child or young person is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

### Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

**Virginity testing** - Also known as hymen, ‘2-finger’ or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

**Hymenoplasty** - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands’ family to fulfil the requirement that a woman remains ‘pure’ before marriage. Those who ‘fail’ to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff

will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. Skills Bridge will educate learners about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where learners feel safe enough to make a disclosure.

Learners aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a learner is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A learner is known to have requested either procedure or asks for help
- Family members disclose that the learner has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the learner is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A learner has already experienced or is at risk of other forms of HBA
- A learner is already known to social services in relation to other safeguarding issues
- A learner discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A learner displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A learner appears fearful of their family or a particular family member
- Unexplained absence from Skills Bridge, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in Skills Bridgework, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

Skills Bridge will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the learner, including expediting arrangements for the procedure.

## Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a learner is at risk of, or has undergone, forced marriage, including, but not limited to, the learner:

- Being absent from Skills Bridge – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming Skills Bridge holidays.
- Being subjected to surveillance by siblings or cousins at Skills Bridge.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from Skills Bridge by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a learner who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or CEO and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or CEO will ensure the learner is spoken to privately about these concerns and further action taken as appropriate. Learners will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the learner's family or those with influence in the community, without the express consent of the learner, as this will alert them to the concerns and may place the learner in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among learners.

If a learner is being forced to marry, or is fearful of being forced to, Skills Bridge will be especially vigilant for signs of mental health disorders and self-harm. The learner will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – Skills Bridge will use existing national and local protocols for multi-agency liaison with police and children's social care.

Skills Bridge will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

Skills Bridge will establish where possible whether learners at risk of forced marriage have a dual nationality or two passports.

Skills Bridge will aim to create an open environment where learners feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

Skills Bridge will take a whole Skills Bridge approach towards educating on forced marriage in Skills Bridge curriculum and environment – in particular, Skills Bridge's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to learners. Learners will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated [through CPD](#) about the issues surrounding forced marriage and the signs to look out for.

## Radicalisation

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting learners from the risk of radicalisation is part of Skills Bridge’s wider safeguarding duties. Skills Bridge will actively assess the risk of learners being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in learners’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify learners who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. Skills Bridge will work with local safeguarding arrangements as appropriate.

Skills Bridge will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, Skills Bridge will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the learner’s parents, unless Skills Bridge has reason to believe that the child or young person would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect learners against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

### *The Prevent duty*

Under section 26 of the Counter-Terrorism and Security Act 2015, all Skills Bridges are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. The Prevent duty will form part of Skills Bridge’s wider safeguarding obligations.

Skills Bridge’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

### *Learners with family members in prison*

Learners with a family member in prison will be offered pastoral support as necessary. They will receive a copy of ‘[Are you a young person with a family member in prison?](#)’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

### *Learners required to give evidence in court*

Learners required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Learners will be provided with the booklet ‘[Going to Court and being a witness](#)’ from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a learner has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – Skills Bridge will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify learners whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how learners' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a learner that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

Skills Bridge will access a range of advice to help them identify learners in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, Skills Bridge's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

## Serious violence

Through training, all staff will be made aware of the indicators which may signal a learner is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from Skills Bridge.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a learner's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from Skills Bridge.
- Having been permanently excluded from Skills Bridge.
- Having experienced maltreatment.

- Having been involved in offending, such as theft or robbery.

Staff members who suspect a learner may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Skills Bridge will cooperate with core duty holders when asked and ensure arrangements are in place to do so.

### Adult involvement in youth-produced sexual imagery

Skills Bridge's full response to youth-produced sexual imagery (YPSI) is outlined in the Youth-produced Sexual Imagery Policy.

#### *Sexually motivated incidents*

Skills Bridge will remain aware that not all instances of YPSI will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

#### *Financially motivated incidents*

Financially motivated incidents of YPSI involving adults may also be called “**sextortion**”, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.

- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.