

Safeguarding Policy



The FAR Academy's approach to safeguarding all of our students is founded in the nature of our relationships. We prioritise assessing and managing the needs of our students and have a dynamic approach to identification, assessment and response to risk.

College / Site	FAR Academy - Whitstable
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Policy owner:	Dez Riddler and Fiona Wood
Queries to be directed to:	Dez Riddler – Inclusion Team/DSL Fiona Wood – Inclusion Team/DSL

This policy will be reviewed on an annual basis.

Date of last review:	September 2023
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LOCAL CONTACTS

Centre Manager	Brent Lewis
Designated Safeguarding Lead (DSL)	Dez Riddler and Fiona Wood

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Central Duty line (urgent child protection)	Call 03000 41 11 11 (text relay 18001 03000 41 11 11) or email social.services@kent.gov.uk
Early Help / Preventative	Stuart Collins stuart.collins@kent.gov.uk
Local Authority	KCC Brook House, Reeves Way, John Wilson Business Park, Whitstable, Kent, CT5 3SS
Local Safeguarding Partnership (LSP)	Canterbury City Council and VSK
Local Adult Safeguarding Board	Call 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

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1. Introduction and purpose of this document

The FAR Academy provides learning programmes to young people aged between 16 and 19, or up to 25 where they have an Education, Health and Care Plan (EHCP).

We specialise in providing learning and training opportunities for students who, for whatever reason, don't want to stay in a traditional ('mainstream') academic environment. We provide our students with a different option – the opportunity to carry on their learning in a smaller, highly supporting environment where the focus is on providing learning and vocationally focused training options to help them to gain skills, qualifications and experiences that will help them to achieve their goals in life.

The FAR Academy is committed to providing and promoting the health and wellbeing of all of our students, and making sure that we do everything we can to keep them safe. The same is true in respect of staff and volunteers, and of any partner agencies that work with us to support our students. This policy sets out how we fulfil this commitment.

The FAR Academy safeguarding aims

The FAR Academy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote young peoples' welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding partnership and adult safeguarding board.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

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- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains education and training provider duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Care Act 2014 <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted> which outlines the duties and powers of the local authority for adult safeguarding.

3. Safeguarding Definitions

Safeguarding and promoting the welfare of young people...	<p>means:</p> <ul style="list-style-type: none"> • Protecting from maltreatment • Preventing the impairment of health and development • Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care. • Taking action to enable all young people to have the best outcomes, or • protecting young people who may be in vulnerable circumstances. <p>Young people may be at risk of abuse or neglect due to the actions (or inaction) of another person or professional, or other staff working with them within and institution.</p>
Child protection...	refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
Abuse...	is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
Neglect...	is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.
Young person...	includes everyone under the age of 18 and staff must follow the procedures for children.
Adult...	is anyone over the age of 18 and staff must follow the procedures for adults.

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4. Commitment to equality and diversity

Some young people have an increased risk of abuse, and additional barriers can exist for some young people with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise young peoples' circumstances. We ensure that all young people have the same protection, regardless of any barriers they may face.

We give special consideration to young people who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the centre and is consistent with the procedures of Local Safeguarding Partnership. Our policy and procedures also apply to off-site activities.

6.1 All staff

In conjunction with reading this policy all staff would have read and understood part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL), the behaviour policy.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

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- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for making referrals to local authority adult social care and following the referral any role they may need to play.
- What to do if they identify a safeguarding issue or a young person tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM, radicalisation and financial abuse.

6.2 Designated Safeguarding Lead (DSL)

Our DSLs are Dez Riddler and Fiona Wood

The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during College opening hours for staff to discuss any safeguarding concerns.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on young peoples' welfare 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
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, adult social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

6. Confidentiality

The FAR Academy will:

- Ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a senior manager or Social Care Worker as required.
- Ensure that the Designated Safeguarding Lead will only disclose any information about a young person to other members of staff on a 'need to know' basis, including Domestic Violence notifications

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- Make all staff aware that they have a professional responsibility to share information with other agencies in order to safeguard young people
- Ensure staff are clear with young people that they cannot promise to keep secrets.
- Timely information sharing is essential to effective safeguarding
- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a young person is suffering, or at risk of, serious harm
- Confidentiality is also addressed in this policy with respect to record-keeping in Section 15.

Further information on data protection can be found in Data Management and Protection policy.

7. Recognising abuse and taking action - Children

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

8.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL (see section 6.2) as soon as possible if you make a referral directly.

Referrals will be made in line with local procedures as outlined on Local Safeguarding Partnership website: www.kscb.org.uk

8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

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- Sign and date the write-up on the Welfare/Concern form and pass it on to the DSL.

8.3 If you discover that Female Genital Mutilation (FGM) has taken place or a student is at risk of FGM

The Department for Education's (DfE) Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving 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. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a young person has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4.

Any teacher who discovers that an act of FGM appears to have been carried out on a **student under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a young person is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff must not examine a young person.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **young person under 18** must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a young person is *at risk* of FGM must speak to the DSL and follow our local safeguarding procedures.

8.4 If you have concerns about a child / young person (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below). You can also contact the charity **NSPCC on 0808 800 5000** if you need advice on the appropriate action.

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Early help

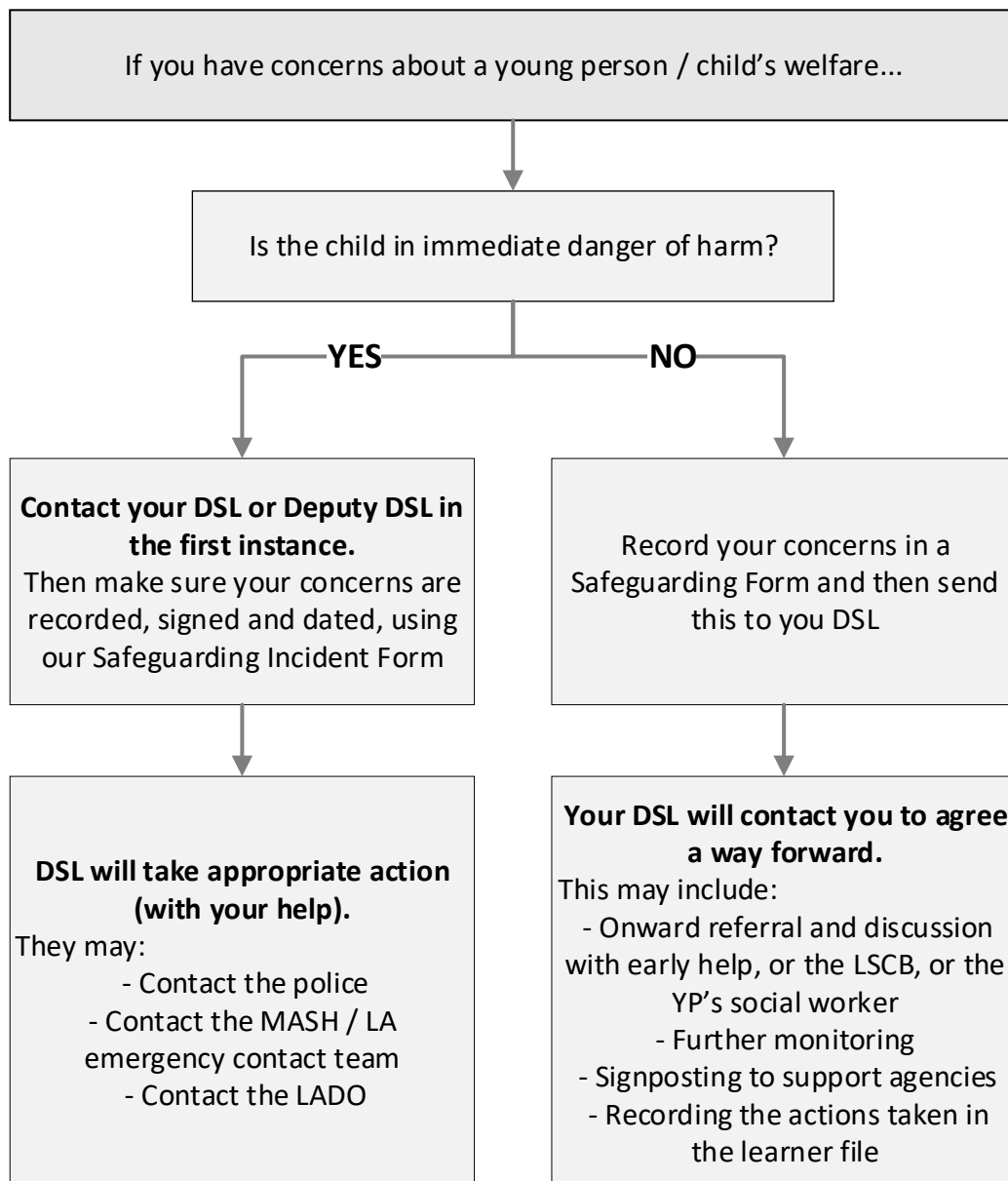
If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL will keep the case under constant review and the centre will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

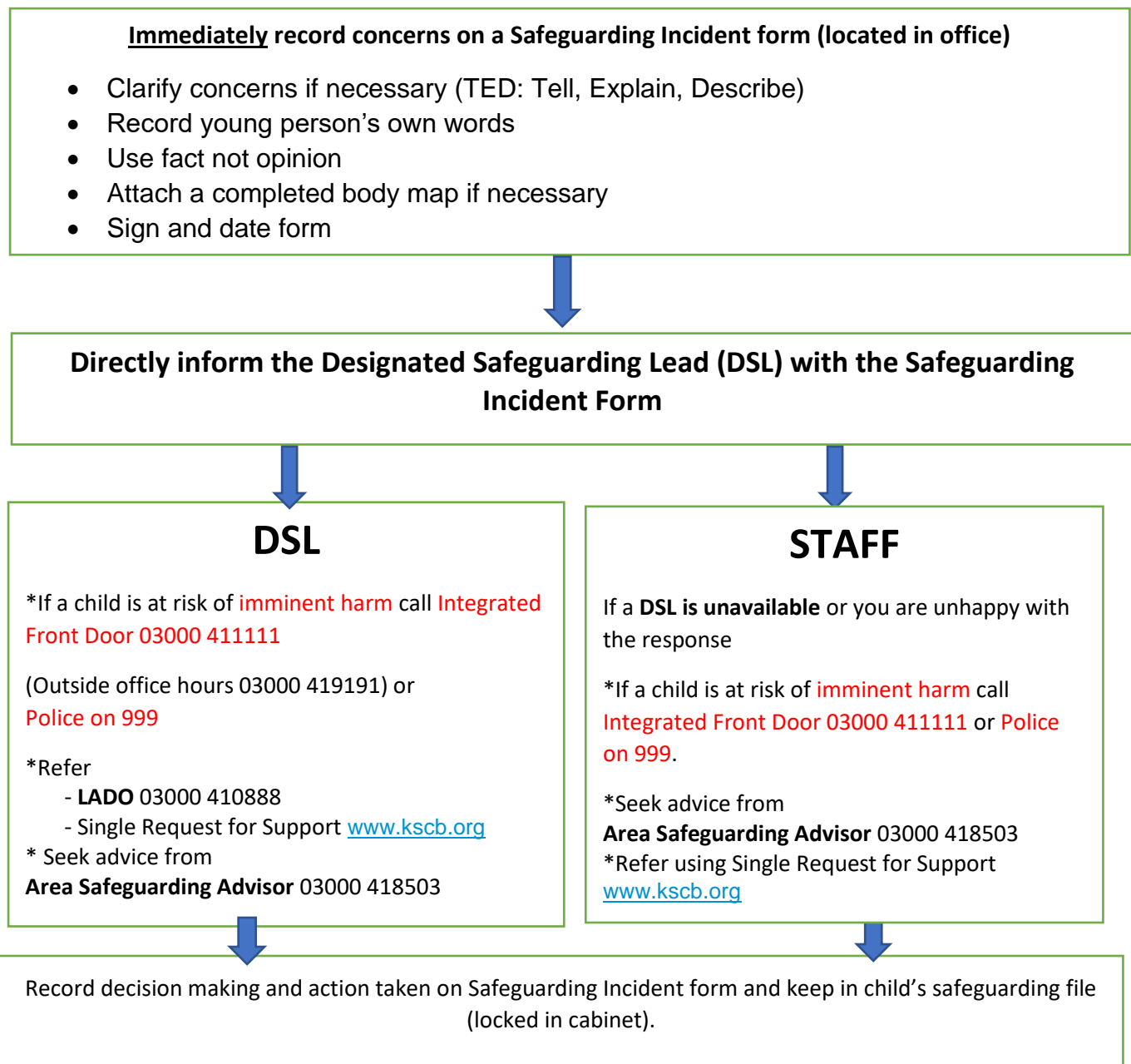
FIGURE 1 SAFEGUARDING PROCEDURE



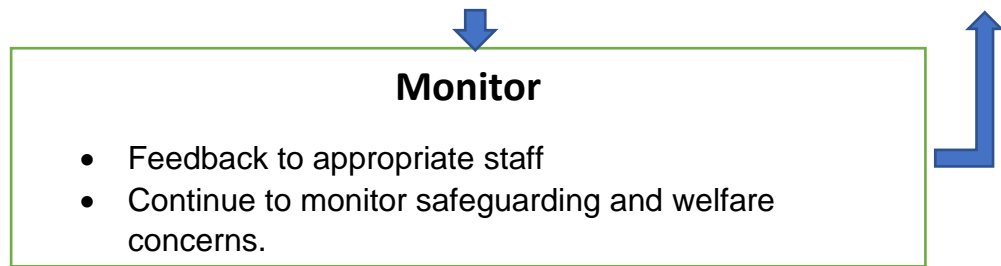
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Safeguarding or Welfare concern procedure

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***Staff and/or DSLs can re-refer at any point to ensure the child's safety and welfare are paramount.**

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The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the young person's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the young person's situation improves.

8.5 If you have concerns about extremism

If a young person is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Local Authority children's social care team.

The Department for Education (DfE) also has a dedicated telephone helpline, **020 7340 7264** that staff and governors can call to raise concerns about extremism with respect to a student.

You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call **999** or the confidential anti-terrorist hotline on **0800 789 321** if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

8. Recognising abuse and taking action - Adults

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

The Care Act 2014 sets out clear legal framework for how local authorities and other parts of health and care systems should protect adults at risk of abuse or neglect.

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Adult safeguarding arrangements are about:

Empowerment:	Presumption of person-led decisions and informed consent.
Protection:	Support and representation for those in greatest need.
Prevention:	It is better to take action before harm occurs.
Proportionality:	Proportionate and least intrusive response appropriate to the risk presented.
Partnership:	Local solutions through services working with their communities have a part to play in preventing, detecting and reporting neglect and abuse.
Accountability:	Accountability and transparency in delivering safeguarding.

An adults' ability to give consent is important when safeguarding and protecting adults at risk. The Mental Capacity act 2005 provides a legal framework for making significant life decisions for adults who lack capacity to make decisions.

When working with adults at risk, a balance is needed between the interventions to protect them, and their right to live their lives without unwarranted or excessive interference, and to exercise autonomy and self-determination.

9.1 Adult abuse and raising a concern

Abuse is mistreatment by any other person or persons that violates a person's human and civil rights. The abuse can vary from treating someone with disrespect in a way which significantly affects the person's quality of life, to causing actual physical suffering.

Abuse can happen anywhere - in a residential or nursing home, a hospital, in the workplace, at a day centre or educational establishment, in supported housing or in the street.

Appendix 2 defines the forms of adult abuse.

If you are concerned an adult is being abused a referral will be made to adult social care duty team. If the adult's immediate safety is at risk call 999 straight away.

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9. Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the lead teacher.

You can discuss any concerns about any staff member or volunteer with the Designated Safeguarding Lead (if different from the lead teacher).

Your lead teacher and/or Operations Manager will follow best practice in respect of managing complaints and allegations against staff, which may include disclosure to the

County Council Local Authority Designated Officer (LADO).

10. Allegations of abuse made against students

We recognise that young people are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”.

Most cases of young people hurting other young people will be dealt with under our centres behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put young persons in the centre at risk
- Is violent
- Involves young people being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting).
- upskirting, typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

If a student makes an allegation of abuse against another young person:

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all young people involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed

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We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards females, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate young people about appropriate behaviour and consent
- Ensuring young people know they can talk to staff confidentially
- Ensuring staff are trained to understand that a young person harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy.

11. Notifying parents / carers

Where appropriate, we will discuss any concerns about a young person with their parents/ carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents/ carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents/carers would increase the risk to the young person, we will discuss this with the local authority social care team before doing so.

In the case of allegations of abuse made against other another young person, we will normally notify the parents of all the young people involved.

12. Considering the wishes of the young person

Where there is a safeguarding concern the DSL will ensure the young persons' wishes and feelings are taken into account when determining what action to take and services to provide. Following a disclosure, the DSL will discuss with the young person and give them an opportunity to express their views. The young person will always be told of next steps following any disclosure. The DSL will always operate with the best interest of the young person at their heart

13. Complaints and concerns about the College or Centre safeguarding practices

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14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our Managing Allegations Against Staff policy.

14.2 Other complaints

For further information on how other complaints will be managed, please read the FAR Academy's complaints policy.

14.3 Whistle-blowing

A separate Whistle-blowing policy outlines the procedures for reporting a concern, how the College will respond, and the protection available for staff who report another member of staff.

For further information read the FAR Academy's whistle-blowing policy.

14. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual young person will be retained for a reasonable period of time after they have left the centre.

The centre will:

- Keep clear, detailed, accurate, written records of concerns about young people (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately
- Ensure all records are kept securely; separate from the main file, and in a locked location

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15. Training and safer recruitment

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the centre safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding board.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify young people at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

16.2 The Designated Safeguarding Lead (DSL)

The DSL will undertake child protection and safeguarding training at least every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

16.3 Governors

All members of the board of trustees receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

16.4 Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the Centre will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the

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Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

16. Policy monitoring and review arrangements

This policy will be reviewed by Dez Riddler, FAR Academy Safeguarding Manager. Following every review, the policy will be submitted to the full FAR Academy Board for approval by The FAR Academy Trustees.

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Appendices

The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse...	may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child
Emotional abuse...	<p>is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p> <p>Emotional abuse may involve:</p> <ul style="list-style-type: none"> ● Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person ● Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate ● Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction ● Seeing or hearing the ill-treatment of another ● Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
Sexual abuse...	<p>involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:</p> <ul style="list-style-type: none"> ● Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing ● Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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	Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
Neglect...	<p>is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.</p> <p>Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> ● Provide adequate food, clothing and shelter (including exclusion from home or abandonment) ● Protect a child from physical and emotional harm or danger ● Ensure adequate supervision (including the use of inadequate care-givers) ● Ensure access to appropriate medical care or treatment <p>It may also include neglect of, or unresponsiveness to, a child's basic emotional needs</p>

Appendix 2: Adult abuse

Forms of abuse include (as defined in the Care Act 2014):

Physical abuse...	including hitting, slapping, and pushing, kicking, misuse of medication, restraint, or inappropriate sanctions
Domestic violence	including psychological, physical, sexual, financial, emotional abuse and honour based violence
Sexual abuse	including rape and sexual assault or sexual acts to which the adult at risk has not consented, or is incapable of giving informed consent or was pressured into consenting. This may involve contact or non-contact abuse (e.g. touch, masturbation, being photographed, teasing, and inappropriate touching)
Psychological abuse...	including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks
Financial or material abuse	including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
Modern slavery...	encompasses slavery, human trafficking; forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at

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	their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
Discriminatory abuse...	including racist, sexist, that based on a person's disability, culture and other forms of harassment, slurs or similar treatment
Organisational abuse...	(previously known as institutional abuse) Neglect and poor professional practice in care settings also need to be taken into account. It may take the form of isolated incidents of poor practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. It can occur when the routines, systems, communications and norms of an institution compel individuals to sacrifice their preferred lifestyle and cultural diversity to the needs of that institution. Repeated instances of poor care may be an indication of more serious problems
Neglect and acts of omission...	including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life, such as medication, adequate nutrition and heating
Self-neglect	Which covers a wide range of behaviours such as neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding

Any of these forms of abuse can be either deliberate or be the result of ignorance, or lack of training, knowledge or understanding. Often if a person is being abused in one way they are also being abused in other ways.

Appendix 3: Safer recruitment and DBS checks – Policy and Procedure

We will record all information on the checks carried out in the centres single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

Safeguarding Policy



- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher

Regulated activity means a person who will be:

- *Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children*
- *Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children*
- *Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not*

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the Police and DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

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We will ensure that any contractor, or any employee of the contractor, who is to work at the College has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the College/Centre.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

Governors

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All Trustees will have an enhanced DBS check without barred list information and Section 128 checks, unless they are working directly in regulated activity, in which case they will have an enhanced DBS check *with* barred list information.

The Chair of the Board of Trustees will have their DBS check countersigned by the secretary of state.

All trustees, proprietors and local governors will also have the following checks:

- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise students on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect young people from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Students staying with host families

Where the College makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the College/Centre is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner agencies/institutions abroad to ensure that similar assurances are undertaken prior to the visit.

Safeguarding Policy



Appendix 4: Specific safeguarding issues

This appendix provides a basic understanding of these topics and staff should also refer to Local Safeguarding Partnership website for local information.

Children / young people missing from education

A child/young person going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

There are many circumstances where a child/young person may become missing from education, but some children are particularly at risk. These include children/young people who:

- Are at risk of harm or neglect
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school/college
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children/young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child/young person leaves the College without a new College or other positive destination being named, and adhering to requirements with respect to sharing information with the local authority, when applicable.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child/young person is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

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Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

<https://www.gov.uk/government/publications/serious-violence-strategy>

Child sexual exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Safeguarding Policy



Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing College, or not taking part in education or training.

County Lines

The UK Government defines county lines as: county lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and the money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child criminal exploitation (CCE) is increasingly used to describe this type of exploitation where children are involved, and is defined as: child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of involvement in county lines may include:

- Persistently going missing from school or home/ and or being found out of area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts/ phone calls and/ or having multiple handsets
- Relationships with controlling/ older individuals or groups
- Leaving home/ care without explanation
- Suspicion of physical assault/ unexplained injuries
- Parental concerns
- Carrying weapons

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- Significant decline in school results/ performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well- being

Female Genital Mutilation (FGM)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from College, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs.

Safeguarding Policy



Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from College
 - Having sections missing from 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Safeguarding Policy



Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools and college have a duty to prevent children and young people from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children and young people at risk.

We will assess the risk of young people in our College/Centre being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our Local Safeguarding Children Board and local police force.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at College / in the Centre and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

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Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children and young people who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in Section 8 of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried.

Checking the identity and suitability of visitors

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All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the College/Centre, we will check their credentials and reason for visiting before allowing them to enter the premises. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All visitors to our College/College, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the College/Centre any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using College/Centre facilities is not seeking to disseminate extremist views or radicalise students or staff.

Missing students

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a young person goes missing, we will notify their parents/ carers immediately, and/or their 'home school' if they are with us for only part of their educational delivery. If necessary, we will then report them missing to the police and keep parents/ carers updated throughout.

Appendix 5: Governance

The Directors of the FAR Academy are overseen by a group of trustees, with each trustee responsible for certain areas of operation of the Academy. All trustees are responsible for safeguarding. The trustees receive safeguarding training and discuss safeguarding, and any current issues, with the Directors of the FAR. They challenge the Directors whenever they feel it is necessary to raise any issues, and they oversee the management of safeguarding throughout the FAR Academy.

Rationale

Organisations that fail to have sufficient and appropriate systems in place to manage their internal corporate risk and governance requirements can quickly become unstable and at risk of significant public damage and potentially closure. The recent lesson from the closure of Kids Company is a salutary lesson for non-statutory organisations in the field of public service delivery.

There are many risks that organisations face however there are 5 key (pillar) risks that, if any one of them becomes a live issue, may result in both commercial and reputational damage to such an extent that survival may be untenable. These are (in no particular order): -

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1. Failure to keep our people & property safe and secure
2. Failure to keep our service users safe
3. Failure to keep our personal data safe and secure
4. Failure to effect and enforce sufficient financial controls
5. Failure to ensure our staff are recruited, trained, managed and supported effectively

Many of these areas overlap both in terms of risk and consequence. Failure to keep our buildings safe puts our staff and service users at risk (H&S) and will lead to loss of morale and issues with retention (People) and potential financial loss/impact due to unbudgeted expenditure or failure to build sufficient budget required by the lease (financial control).

Bringing together the corporate and operational leads in each of the 5 pillars of risk at one Board meeting (rather than 4-5 individual meetings) will have the following benefits: -

1. Reduce duplication of
 - a. Attendance by the same people for different meetings
 - b. Discussion of the same or overlapping agenda items
2. Increase awareness of
 - a. Risk 'hotspots' i.e. services or areas where incidents or concerns are being raised across a number of risk areas
 - b. Responsibility that all managers and staff hold in managing the risks via a line management dissemination of key points from the Board
 - c. Legislative, regulatory or policy updates that will impact on systems and the rationale for changes
3. Improve
 - a. Systems, policies and processes with input from all parts of the organisation
 - b. Joint/shared learning and solution finding
 - c. Activity and focus for internal audit purposes ensuring that at least two of these risk areas are audited in each financial year.

Appendix 6: Equality Impact Assessment

The FAR Academy is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

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An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. While currently only public bodies are legally required to complete EIA's, The FAR Academy has adopted the process in line with its commitment to continually improve our equality performance.

1. Summary

This EIA is for:	The FAR Academy Safeguarding Policy
EIA completed by:	Brent Lewis
Date of assessment:	9 September 2023
Assessment approved by:	N/A

Objectives and intended outcomes

This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of the FAR Academy Safeguarding Policy for all staff have been fully considered and addressed, whether or not the staff members share a protected characteristic.

Policy Name

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Summary
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The policy includes specific guidance and instructions for children/young people and for adults.</p> <p>Unless otherwise stated, all other elements of the policy apply equally for all students and to all members of staff regardless of age. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their age.</p>
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The policy applies equally to all students and for all members of staff regardless of health/disability. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their disability.</p>
Pregnancy & Maternity/paternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>It's not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave.</p>
Race (incl. origin, colour and nationality)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The policy applies equally to all students and all members of staff regardless of their race, origin, colour or nationality. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.</p>
Gender and Gender Re-assignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The policy applies equally to all students and members of staff regardless of their gender at any given time. It's not considered that the policy includes any guidance or rules that may impact either</p>

Policy Name

				positively or negatively on any member of staff because of gender.
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all staff and all members of staff regardless of their sexual orientation. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because their sexual orientation.

3. Negative impacts and mitigations

Negative Impact	Mitigation	Owner