

CHILD PROTECTION AND SAFEGUARDING POLICY

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1. Overriding Principles

The YMCA places great expectations and importance of early intervention to protect young people from harm and promote their welfare. Therefore, all Trustees, staff, volunteers, partners, stakeholders, or visitors working on, associated with, or visiting our delivery across YMCA Plymouth & Discovery College will ensure:

- everyone must be aware of what to do in the event of having concerns about the safeguarding, welfare or protection of a learner or receiving allegations of a safeguarding or extremist nature
- everyone must take responsibility to provide a safe environment where adults and young people can learn and develop

- leaders and managers must sustain a culture of vigilance where learners' welfare is promoted and where timely and appropriate safeguarding action is taken for learners who need extra support or who may be experiencing, or likely to experience, abuse, neglect or exploitation so that:
 - learners are safe and ready to learn
 - tutors are safe and ready to teach
 - managers are safe and ready to lead

YMCA Plymouth recognises that the welfare and safety of children, young people and *vulnerable adults is critically important and strive to provide a safe and secure environment.

**For the purposes of this policy a vulnerable adult is defined as a person who may be unable to take care of themselves or protect themselves against significant harm due to their age, illness, disability or mental health.*

YMCA Plymouth take seriously their responsibility under the Education Act 2002 and 2011, Care Act 2014, Adult Safeguarding Vulnerable Groups Act 2006 (SOVA) and the Protection of Vulnerable Adults Act 2012 (POVA) to safeguard and promote the welfare of children and young people and, in line with the Information Sharing Guidance 2008, to work together with other agencies to ensure adequate arrangements within the Plymouth Adult Education contract to identify, assess, and support those children and young people who are experiencing harm. It also acknowledges its responsibility under the Counter Terrorism and Security Act and Prevent Duty (2015) to protect young people and adults who could be susceptible to radicalisation into terrorism. The Board understands its duty in regard to the reporting procedures concerning The Female Genital Mutilation (FGM) Act 2003 as amended by the Serious Crime Act 2015.

In addition, to promote effective safeguarding for everyone, this policy also relates to all other relevant, including statutory, guidance on Safeguarding and Prevent from:

- 'Keeping children safe in education 2025', Department for Education, from 1st Sep 2025
https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf
- Care and Support Statutory Guidance
<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

- Education and Skills Conditions of Funding for Local Authorities (Learner welfare is set out in Conditions of Funding for Local Authorities)
<https://www.gov.uk/guidance/dfe-education-and-skills-agreements-and-accountability-agreements-2025-to-2026>
- <https://www.gov.uk/government/publications/prevent-duty-guidance>
- Education Inspection Framework, Ofsted Revised Sept 2025
<https://www.gov.uk/government/collections/education-inspection-framework?#guidance-for-education-providers>
- 'Working together to safeguard children', Department for Education, June 2025;
<https://www.gov.uk/government/publications/working-together-to-secure-children-2>
- 'Positive environments where children can flourish: a guide for inspectors about physical intervention and restrictions of liberty', Ofsted, March 2018;
<https://www.gov.uk/government/publications/positive-environments-where-children-can-flourish>
- *For most recent safeguarding updates please refer to **Annex B***

All children, young people and vulnerable adults, whatever their age, disability, gender (including reassignment), race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity have the right to protection free from abuse, in line with the Equality Act 2010.

The procedure to follow in the event of an Incident can be found at Annex A, and the report form is contained at Annex B

Finally, the Association aims to implement best practice with regards to Safeguarding and Child Protection. The Association has a designated safeguarding team, managed by the Lead Safeguarding Officer. The expectation of the Safeguarding Team is to ensure best practices. They have the responsibility and authority to review procedures, attend regular Safeguarding meetings (monthly and minuted) and undertake annual Safeguarding training. It is the responsibility of the Safeguarding team to ensure that all the Association's staff receive the necessary levels of training every two years minimum (for good practice this is undertaken annually), whilst operating in a culture where Safeguarding principles are suitably promoted.

2. Purpose

The purpose of this policy is to provide children, young people and vulnerable adults with appropriate safety and protection whilst under the care of YMCA Plymouth.

It provides a framework that enables all staff, volunteers and service users to understand their responsibilities towards the safeguarding of children, young

people and vulnerable adults and where applicable, to report concerns to the appropriate officer.

The policy seeks to promote the safeguarding of children, young people and vulnerable adults and encourage the prevention of abuse by raising awareness through the activities and services available at the centre and promote principles of best practice within the safeguarding agenda.

In addition, YMCA Plymouth works collaboratively to receive updates and training from, check materials and share locally held information across the contract from:

- Plymouth Safeguarding Adults Partnership
<https://www.plymouth.gov.uk/adultsandchildrensocialcare/adultcareandhealth/adultsafeguarding/plymouthsafeguardingadultspartnership>
- Plymouth Multi-Agency Adult Safeguarding Policy and Procedures
<https://www.plymouth.gov.uk/plymouth-multi-agency-adult-safeguarding-guidance>
- Plymouth Safeguarding Children Partnership (PSCP)
<https://plymouthscb.co.uk/>
- Plymouth LSCP Procedures Manual
<https://plymouthchildcare.trixonline.co.uk/>

3. Definitions of Abuse

YMCA Plymouth recognises that abuse can take different forms and have defined 6 categories of abuse;

i. Physical Abuse

Physical abuse is deliberately causing physical harm to a child, young person or vulnerable adult. This might involve punching, kicking, biting, burning, shaking, throwing or beating with objects. Using belts, whips, sticks or other similar objects as a form of administering discipline is also physical abuse. Further physical abuse can include misuse of medication, restraint, drowning or suffocation. It is against the law to discipline a child, young person or vulnerable adult by doing any of these things.

Symptoms that indicate physical abuse can include:

- Bruising in unusual places, such as the face or the back

- Finger mark bruising or grasp marks particularly on the limbs or chest in a child
- Bites
- Burn and scald marks, small round burns that could have been caused by a cigarette
- Fractures to arms, legs or ribs in a child
- Large numbers of scars of different sizes or ages

ii. Emotional Abuse

Emotional abuse can be much more difficult to detect than physical abuse because there are usually no physical signs. It can include intimidation, verbal abuse or conveying that they are worthless, unloved, inadequate or valued only if they meet the needs of another person. Emotional abuse can also include constantly belittling or comparing them unfavourably to others.

It may involve causing a child, young person or vulnerable adult to feel frightened or in danger. It can also result from being prevented from social contact with others. Children, young people and vulnerable adults who are living with domestic violence are also affected by the atmosphere of fear and violence within the home.

Symptoms that can indicate emotional abuse include:

- Children being excessively clingy
- Attention seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness
- Anxious behaviour such as rocking and/or hair twisting
- Self-harming
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

iii. Sexual Abuse / Harrassment

Sexual Harassment - If someone behaves in a way which makes you feel distressed, intimidated or offended, and the behaviour is of a sexual nature, this is called sexual harassment.

Sexual harassment = unwanted conduct of a sexual nature for adults.

This is sexual ABUSE for anyone under 18, or over 18 who meets the adult safeguarding threshold

Sexual abuse may involve direct or indirect sexual exploitation, harassment or corruption of children, young people or vulnerable adults by involving them in inappropriate sexual activities. It includes any touching, stimulating, rubbing or patting that is meant to arouse sexual pleasure in the offender. Sexual abuse can also involve sexual contact between a significantly older and younger child. In addition, it includes exposing children to pornography and unsuitable videos and images, i.e. on the internet. Under the Sexual Offences Act 2003, any sexual activity – contact or non-contact – with a child under the age of 18 is a crime.

Symptoms of sexual abuse include:

- Allegations or disclosure
- Genital soreness, injuries or discomfort
- Sexually transmitted infections; urinary tract infections
- Excessive preoccupation with sex; inappropriately sexualised play, words or drawings
- A child who is sexually provocative or seductive with adults

Older children and/or young people or vulnerable adults may additionally exhibit:

- Depression
- Drug and/or alcohol misuse
- Eating disorders
- Obsessive behaviours
- Self-harm/mutilation, suicide attempts
- School/peer relationship problems and difficulties

iv. Neglect

Neglect is the persistent failure to meet a child's, young persons or vulnerable adult's basic physical and/or psychological needs, causing damage to their health and development. It may involve a parent or carer failing to provide adequate food, heat, shelter or clothing, failure to protect from harm or danger, or failing to access adequate medical care and treatment when necessary. It can exist in isolation or in combination with other forms of abuse.

Symptoms of neglect can include:

- Inadequate supervision of children
- Lack of stimulation, social contact or education
- Inadequate responses to emotional needs
- Inadequate nutrition, leading to ill health
- Constant hunger; stealing or gorging food
- Failure to seek or follow medical advice

- Repeated wearing of inappropriate clothing for the weather

v. Mental health

Links have been added to resources to help staff support children and young people's mental health, including DfE guidance on mental health and behaviour in schools (DfE, 2018).

vi. Peer-on-peer abuse

Guidance has been expanded, emphasising that all staff should understand the importance of challenging inappropriate behaviour between children and young people. Staff should also recognise that downplaying inappropriate behaviours as "just banter" can lead to a culture of unacceptable behaviour, an unsafe environment for children and young people and a culture that normalises abuse.

New - We recognise that peer-on-peer abuse can take many forms, including physical, sexual, emotional, and online abuse. To help prevent and address this, we will include relevant topics on healthy relationships, consent, and online safety. We ensure that our curriculum has regard to the latest statutory guidance, and for post-16 students, these issues will be covered through tutorials.

As an organisation, we also have a separate Sexual Violence and Harassment Policy and Procedure that focusses on Peer on Peer Abuse - https://docs.google.com/document/d/1T0p33EqKT5HyaB_rstqmWbIRedPIAQSMwjAcm0DoIzE/edit?tab=t.0#heading=h.vbcys6avj8v7

4. Employment and Recruitment

YMCA Plymouth will ensure safe practice in the recruitment and employment of all paid staff, volunteers and board members. This is achieved by obtaining an enhanced DBS check and 2 written references for every employee who works regularly with children, young people or vulnerable adults. DBS update declarations are also required from staff every 3-years. In addition, ALL staff undertake an annual Safeguarding Self-Declaration, alongside the KCSIE annual declaration.

Finally, the recruitment team **WILL** undertake 'Safer Recruitment Training' and conduct online searches as part of their due diligence (updated Sept 2025) during the recruitment process. The stated aim of this is that it may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.

Schools and colleges can use the DfE’s Check a teacher’s record to make prohibition, direction, restriction, and children’s barred list checks. The service is free to use and is available via the DfE’s web page. Users will require a DfE Sign-in account to log onto the service.

5. Training of Staff, Volunteers and Board Members

All staff, volunteers and board members who may have regular or close contact with children, young people and vulnerable adults will be required to complete the minimum legislative safeguarding training requirements that enable them to recognise and respond to children, young people or vulnerable adults' welfare concerns and identify signs of abuse. All YMCA staff and leaders are to receive regular updates on safeguarding at least annually. Designated Safeguarding Officers will be required to update their accredited training every two years.

6. Named Safeguarding Officer

The named Lead Safeguarding Officer for YMCA Plymouth is:

Joe Stephenson - Head of Discovery College

Designated Safeguarding Officers in YMCA Plymouth’s Safeguarding Team across the association are;

Location	Name
Discovery College	Nicole Chapman
Discovery College	Magdalena Hooper
YMCA Plymouth	Sarah Newberry
YMCA Plymouth	Stacey Ferris
YMCA Plymouth	Tom Lavis
YMCA Torpoint	Karl Curtis
Board of Trustees (Link Trustee)	Jo Greenwood

For details of the role of the Safeguarding Officers see Paragraph 12.

7. Confidentiality and information sharing

YMCA Plymouth is committed to valuing the rights of the child, young person or vulnerable adult whilst recognising the responsibility to use, hold and safeguard information received. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only.

Information will be stored in a secure place with limited access to designated people only (CPOMs system), in line with data protection laws (See Data Protection policy). YMCA Plymouth is committed to promoting good practice in communication with other agencies to ensure the welfare and safeguarding of all children, young people and vulnerable adults. Notices will be displayed to inform who the Designated Safeguarding Officers are and what they should do if they have any concerns. These arrangements will also be covered as part of all user induction sessions and annual refresher training.

Please see **ANNEX C** for more information on sharing of information.

8. Safeguarding Staff

YMCA Plymouth will ensure that effective communication between management and staff occurs to raise staff and volunteers and board member awareness of the risks. Staff should ensure that they work in an open environment and avoid unobserved situations, demonstrating exemplary behaviour in order to protect themselves from false allegations.

YMCA Plymouth will ensure that all staff, volunteers and board members regularly review and evaluate their own practice against established good practice, and when necessary, challenge existing practice to ensure their safety and protection against accusations of abuse. The Association has responsibility to ensure that systems are in place to support staff and volunteers throughout any investigation process and afterwards.

YMCA Plymouth will support and protect those staff, volunteers and board members who report suspicions of abuse or concerns about their colleagues' actions.

9. Internal enquiries and suspension/Allegations against Staff

The Lead Safeguarding Officer in conjunction with the Human Resources Consultant, will decide on whether any individual accused of abuse should be temporarily suspended pending further police and any other enquiries that might be undertaken.

An allegation should be managed under these procedures if it is suggested that a person working with children has:

- Harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates they may pose a risk of harm to children; or
- Behaved in a way that indicates they may not be suitable to work with children (including "transferable risk" from their private life).

Immediate Reporting Procedure

1. Initial Report: Any member of staff who receives an allegation or has a concern must report it immediately to the Designated Safeguarding Lead (DSL)
2. Conflict of Interest: If the allegation is against the DSL, it must be reported directly to the Chair of Trustee (Vic Hibbert).
3. Confidentiality: Allegations must be handled with the highest level of confidentiality. Staff must not investigate the matter themselves or interview the child or the accused person.
4. Consultation with the LADO: The DSL will contact the Local Authority Designated Officer (LADO) within one working day of the allegation being made. No internal disciplinary action or investigation that could bias a criminal inquiry will take place until the LADO (and, if necessary, the Police or Social Care) has been consulted.

Following consultation with the LADO, the following three strands of investigation may occur:

- Police investigation of a possible criminal offence.
- Enquiries by Children's Social Care regarding child protection concerns.
- Internal disciplinary proceedings by the organisation.

The organisation has a legal duty to refer any member of staff to the Disclosure and Barring Service (DBS) if they are dismissed or removed from "regulated activity" (or would have been had they not resigned) because they harmed a child or were considered a risk of harm.

Irrespective of any enquiry findings or police enquiries, the YMCA disciplinary process will be followed on all individual cases to decide whether any penalty is appropriate. There might be occasions when no action is taken by the police because of a lack of evidence. However, the disciplinary process is based on the balance of probabilities, so internal penalties might still be appropriate. The welfare of the child, young person or vulnerable adult should remain of paramount importance throughout.

10. Other users of Association facilities

The Association provides facilities that are used regularly by other groups and clubs. The Lead Safeguarding Officer will ensure that those groups and clubs have appropriate Safeguarding policies and procedures in place.

11. Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children). Where such an allegation is made, staff, volunteers and board members should follow the procedures as detailed within this policy.

12. Designated Safeguarding Officers Role & Terms of Reference

Within YMCA Plymouth the Designated Safeguarding Officers will:

- Maintain a high profile as the recognised point of contact freely available to all staff, volunteers, board members and members of the public wishing to raise concerns or seek help and guidance on any questions connected with YMCA Plymouth safeguarding policies and procedures;
- Ensure safeguarding is a standing agenda item in all departmental & leadership meetings, ensuring there's a regular culture of continued safeguarding discussions and sharing of good practice, including regular circulation of Safeguarding / Prevent Newsletters
- Will share good practices, update on current Child Protection concerns, or close previous Safeguarding investigations.
- Develop and maintain links with the relevant statutory authorities;

- Representing the key link to statutory agencies (Social Care or Police);
- Implement and promote the Child Protection policy and procedures;
- Ensuring all staff and volunteers are familiar with, and adhere to the YMCA Plymouth's Safeguarding Policy;
- Regularly report to the YMCA Plymouth Board of Trustees;
- Support and raise awareness of the protection of children, young people and vulnerable adults;
- Communicate with staff and volunteers on issues of Safeguarding & Child Protection;
- Keep abreast of developments and understand the latest information on data protection, confidentiality and other legal issues that impact upon the protection of children, young people and vulnerable adults;
- Keeping an up-to-date knowledge and understanding of the area of child protection, including attending appropriate training, as deemed suitable by the Plymouth Safeguarding Board;
- Encourage good practice and support of procedures to protect children and young people;
- Maintain confidential records of reported cases and action taken and liaise with statutory agencies and ensure they have access to all necessary information;
- Organise ongoing training for staff, volunteers and board members on a two-year refresher basis;
- Be available out of hours;
- Ensure that when on leave or absent from work for any significant period that the role of Designated Safeguarding Officer is suitably covered by another member of staff.

13. Good practice

Abuse can occur within many situations, including the home, school, children's centre, learning and sporting environments as well as the wider community. Some individuals will actively seek employment or voluntary work with children, young people and vulnerable adults to harm them. A coach, instructor, teacher, official or volunteer will have regular contact with children, young people and vulnerable adults and be an important link in identifying cases where they need protection. All suspicious cases of poor practice must be reported following the guidelines in this policy document.

Good practice means:

- Treating all children, young people and vulnerable adults equally with respect and dignity.
- Always putting the welfare of children, young people and vulnerable adults first.

- Keeping a written record of any injury that occurs, along with the details of any treatment given.
- Displaying the name and contact details of the Designated Safeguarding Officers in places accessible to all children, young people and adults so that they are aware of who to talk to if there are any concerns.
- Contributing to a culture of openness, where everyone (including children and young people) feels free to share their views and concerns.
- Avoiding being left alone with a child, young person or vulnerable adult where you cannot be observed by others.
- Being aware of your language, tone of voice and where you put your body.
- Not letting children, young people or adults involve you in excessive attention seeking that is overtly sexual or physical in nature.
- Understanding the filtering and monitoring systems in place at the YMCA / Discovery College, i.e. what kinds of websites students are visiting.
- Expectations and responsibilities in relation to filtering and monitoring will be included in safeguarding training annually and at induction for all new staff. YMCA Plymouth / Discovery College currently use 'Securly' & 'Google Workspace' as our main filter and monitoring systems.
- The recruitment team will conduct online searches as part of their due diligence processes.
- Be alert to absenteeism / persistent absenteeism, which may be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.
- Suitably dealing with allegations against agencies and individuals who might use YMCA / Discovery College (i.e. extra-curricular sessions) – See Annexe B part 3.
- **New** – Recognise and address the risks posed by misinformation, disinformation, and conspiracy theories, and ensure staff and learners are equipped to identify and respond to this type of harmful online content.
- **New** - Ensure that the use of generative artificial intelligence (AI) aligns with the DfE's 'Generative AI: product safety expectations' guidance, and that existing filtering and monitoring systems apply to and are effective for all AI tools used within the setting.
- **New** - When placing a child in alternative provision, obtain written confirmation of appropriate staff safeguarding checks and details of any arrangements that may put the child at risk. Maintain records of the provider's address and any satellite sites, and regularly review the placement to ensure it remains safe and meets the child's needs. If safeguarding concerns arise, the placement must be immediately

reviewed and, if necessary, ended.

- **New** - Ensure that all attendance procedures and strategies align with the Department for Education's statutory guidance, 'Working together to improve school attendance'.

Staff should not engage in any of the following:

- engage in rough physical or sexually provocative games
- allow or engage in any form of inappropriate touching
- allow children to use inappropriate language unchallenged
- make sexually suggestive comments to a child, young person or adult even in fun
- reduce a child to tears as a form of control
- allow allegations made by a child, young person or vulnerable adult to go unchallenged, unrecorded or not acted upon.

NB: It may sometimes be necessary for staff or volunteers to do things of a personal nature for children, young person or vulnerable adult, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents and the players involved. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

14. Female Genital Mutilation (FGM)

"FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practised on a child, it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. Girls are at particular risk of FGM during the school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM. UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women."

In order to protect our children, it is important that key information is known by all of the school community. Indications that FGM has taken place:

- Prolonged absence from school with noticeable behaviour change
- Spend long periods of time away from the class during the day.
- A child who has undergone FGM should be seen as a child protection

issue.

Indications that a child is at risk of FGM:

- The family comes from a community that is known to practice FGM - especially if there are elderly women present.
- In conversation a child may talk about FGM.
- A child may express anxiety about a special ceremony.
- The child may talk or have anxieties about forthcoming holidays
- Parent/Guardian requests permission for authorised absence for overseas travel or you are aware that absence is required for vaccinations.
- If a woman has already undergone FGM – and it comes to the attention of any professional, consideration needs to be given to any Child Protection implications e.g. for younger siblings, extended family members and a referral made to Social Care or the Police if appropriate.

Any concerns that children are at risk or victims of Female Genital Mutilation then this should be discussed with the Designated Safeguarding Officer immediately.

15. Prevention of Radicalisation & Extremism (PREVENT Duty)

Prevent is part of a government initiative to develop a robust counter terrorism programme – CONTEST. At the YMCA, prevention and awareness will come under the jurisdiction of the Safeguarding Team / DSL. All the terrorist groups that pose a threat to the YMCA seek to radicalise and recruit people to their cause. Therefore, the Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation that need to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat levels has been created, which represents the likelihood of an attack in the near future. The levels are:

- a) **Critical**- an attack is expected imminently
- b) **Severe** – an attack is highly likely

- c) **Substantial** – an attack is likely
- d) **Moderate** – an attack is possible but not likely
- e) **Low** – an attack is unlikely

The current threat level from international terrorism in the UK is **substantial** which means that a terrorist attack is a strong possibility.

<https://www.mi5.gov.uk/threats-and-advice/terrorism-threat-levels>

The age and profile of young people make it crucial to be involved in the Prevent strategy. YMCA foster shared values and promote cohesion. This strategy has five key objectives which YMCA will adhere to:

1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner voice.
2. To break down segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society
3. To ensure the safety of young people and that the establishment is free from bullying, harassment and discrimination
4. To provide support for all our young people who may be at risk and appropriate sources of advice and guidance
5. To ensure that all our young people and staff are aware of their roles and responsibilities in preventing violent extremism.

If you're worried about someone, call the ACT Early Support Line on **0800 011 3764**, in confidence, to share your concerns with our specially trained officers.

<https://actearly.uk/contact/>

There are three further radicalisation risks YMCA staff must make young people aware of post-pandemic:

- **Exposed to misleading and hateful content:** Young people may have been exposed to fake stories or conspiracy theories about COVID-19, which attribute blame to minority groups.
- **Engaged with extremist individuals:** Young people may have been more likely to become exposed to, or engaged with, extremist organisations or individuals, especially online during and shortly after the pandemic.
- **Increased vulnerability to radicalisation:** COVID-19 may have increased vulnerability to radicalisation as children and young people may feel isolated, anxious, frustrated and angry. This could increase the resonance of intolerant messaging and the appeal of extremist groups or individuals offering explanations for the crisis.

As a result, YMCA staff undertake annual Prevent training, plus our students will learn of such concerns during their annual PSHE sessions on BV / Prevent sessions.

16. Online Learning / Distance Learning

This section was constructed following the guidance of The South West Grid for Learning Trust, which is an educational trust with an international reputation for supporting schools with online safety.

This online safety policy has been developed by a working group/committee made up of:

- CEO (Lead Safeguarding Officer) and SLT
- Safeguarding Team
- Safeguarding Trustee
- HR Consultant

Discovery College / YMCA Plymouth will regularly monitor the impact of the policy using:

- Logs of reported incidents (Via CPOMs)
- Monitoring logs of Securly and Google logs

Scope of the Policy

This policy applies to all members of the Discovery College / YMCA Plymouth (including staff, students/pupils, volunteers, parents/carers, visitors, community users) who have access to and are users of college digital technology systems, both in and out of the college.

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of students/pupils when they are off the college site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other online safety incidents covered by this policy, which may take place outside of the college, but is linked to membership of Discovery College / YMCA Plymouth. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data (see appendix for template policy). In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

Online Safety Lead

The IT Manager and Lead Safeguarding Officer (LSO) will also take the lead for online safety and it will be his/her responsibility to:

- Use the YMCA's 'Securly' system take day to day responsibility for online safety issues and has a leading role in establishing and reviewing the college online safety policies/documents
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provide training and advice for staff
- liaise with the Local Authority / relevant bodies
- liaise with Discovery College / YMCA Plymouth technical staff
- receives reports of online safety incidents and creates a log of incidents (Utilising CPOMs) to inform future online safety developments.
- meet regularly with safeguarding team to discuss current issues, review incident logs and filtering/change control logs
- attend relevant meetings with Trustees and keeps them fully briefed as appropriate
- report regularly to Senior Leadership Team

Students / Pupils

The education of staff and students in online safety/digital literacy is therefore an essential part of the Discovery College / YMCA Plymouth's online safety provision. Children and young people need the help and support of the college to recognise and avoid online safety risks and build their resilience.

Online safety should focus on:

- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities
- Students/pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Students/pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Students/pupils should be helped to understand the need for the student/pupil acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school/academy.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices
- In lessons where internet use is pre-planned, it is best practice that

students/pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.

- Where students/pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.
- **New** - Students should be;
 - Educated on how to identify and protect themselves from harmful online content, including illegal or inappropriate material, misinformation, disinformation (such as fake news), and conspiracy theories.
 - Taught to recognise the risks of harmful online contact with other users, such as peer pressure, commercial advertising, and adults who may be grooming or exploiting them.
 - Guided by their own online conduct, with a focus on avoiding harmful behaviours like cyberbullying and the sharing of explicit images.
 - Informed about the risks of online commerce, including gambling, inappropriate advertising, and financial scams like phishing.

Staff

All staff must receive online safety training and understand their responsibilities, as outlined in this policy:

- Staff should be supportive throughout distance learning interactions and willingly guide students through new technology processes/software
- Professionally conduct themselves as you'd expect from a teacher / TA/staff member
- Undertake cyber security training (Annually - EduCare). This will be regularly updated and reinforced. An audit of the cybersecurity training needs of all staff will be carried out regularly.
- Ensuring staff fully understand the Discovery College / YMCA Plymouth online safety policy and acceptable use agreements.
- Staff take care to ensure the safekeeping of personal data, minimising the risk of its loss or misuse
- Where personal data is stored or transferred on mobile or other devices (including USBs), these must be encrypted and password-protected.

- will not transfer any school/academy personal data to personal devices except as in line with school policy
- Use distance learning resources professionally and in the same regard as classroom-based teaching (i.e. via Google Hangouts / Classroom)

Responding to incidents of misuse

If there is any suspicion that the website (s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right-hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.

17. Informing DfE about serious safeguarding incidents

New - Informing DfE about serious safeguarding incidents

The DfE has replaced the ESFA in the specific role of assuring the Secretary of State (SoS) regarding safeguarding. For this reason, the DfE must be made aware when an institution or one of its subcontractors is the subject of an investigation by the local authority or the police.

In such circumstances, the Chair, Chief Executive, or Designated Safeguarding Lead must inform the DfE of the incident. This is no longer done via a general email but through the DfE's dedicated reporting portal.

<https://childsafeguarding.education.gov.uk/>

You should also refer to the DfE's guidance on reporting a serious child safeguarding incident for further information on what needs to be reported and the process involved.

18. References

This policy statement has been written with particular reference to the following legislation:-

- KCSIE Sept 2025
- The Children Act 1989
- The Children Act 2004
- Every Child Matters, Change for Children 2004
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Public Interest Disclosure Act 1988
- DfE's Keeping Children Safe in Education (whole Doc)

In addition to the above legislation guidance and advice has been sought from the following: -

- Plymouth Safeguarding Children Board Inter-Agency Training Literature
- Local Safeguarding Children's Board Guidance
- YMCA England Child Protection Guidelines
- Working together to Safeguard Children 2015
- The Protection of Children in England – A Progress Report – Lord Laming 2009
- Surestart Children's Centres – Practice and Guidance
- Surestart Children's Centres – Statutory Guidance
- Statutory framework for the Early Years Foundation Stage
- Safeguarding Children and Safer Recruitment in Education
- Plymouth City Council Guidance –What to do if you're worried a child is being abused
- Ofsted Guidance
- On Course South West's (OCSW) Safeguarding Team
- NSPCC CASPAR briefing on key updates to statutory guidance for schools in England for 2022, 2023, 2024 and 2025, September 2025

ANNEX A - Procedure to follow if abuse is disclosed, discovered or suspected

Staff are reminded at this point that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

Therefore, responding appropriately to suspicions of abuse is important. If you receive a disclosure, allegation or suspect abuse you should:

- Act promptly
- Discuss your concerns immediately with the Designated Safeguarding Officer for your department
- If your Designated Safeguarding Officer is unavailable, you should discuss your concerns with any of the other Designated Safeguarding Officers, or the Lead Safeguarding Officer
- **New** - If the concern arises out of hours you should contact Joe Stephenson Lead Safeguarding Officer on: **07305098961**
- If you have serious suspicions or concerns and are unable to contact anyone you should always take action by contacting:
 - The Plymouth Multi-Agency Safeguarding Hub (MASH):
 - 01752 **668000** (during working hours), or;

- 01752 **346984** (out of hours).

If someone discloses to you:

- Stay calm, avoid showing you are shocked or appalled
- Look at the child, young person or vulnerable adult directly
- Accept what the child, young person or vulnerable adult says
- Do not press for information
- Know the person may have been threatened
- Tell the child, young person or vulnerable adult that they are not to blame
- Reassure the child, young person or vulnerable adult that they are right to tell and that you believe them
- If appropriate, seek the child's, young persons or adult's permission to share your concern with the Designated Safeguarding Officer. In some circumstances, you may need to explain that you are legally bound to do so. If you are concerned about possible abuse in a young child, it may be appropriate to share your concern with the parent. However, you should not do this if you consider this might put the child at further risk.
- Let them know what you are going to do next, who you are going to tell and why.
- As soon as possible afterwards record full details of the discussion with the young person or vulnerable adult via the CPOMS system.
- CPOMS automatically informs the Designated Safeguarding Officer and relevant Safeguarding Leads who will, if suitable, contact the appropriate Advice and Assessment team/police.

Searching, screening and confiscation at the YMCA

Staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules, or the staff member has good reason to suspect the device may be used to:

- Cause harm,
- Disrupt teaching,
- Break college/centre rules,
- Commit an offence,
- Cause personal injury, or
- Damage property.

Any data, files or images that are believed to be illegal must be passed the Police as soon as practicable, including pornographic images of children, without deleting them. Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the college's behaviour policy.

What happens next?

The process of professional involvement in cases of sexual abuse of a child, young person or vulnerable adult will usually follow this course:

- A strategy discussion involving Advice and Assessment, Police Safeguarding Team, other significant professionals and the person suspecting abuse or to whom the child, young person or vulnerable adult spoke.
- A decision will be taken as to whether an investigation is warranted. If so, it will then be planned.
- The investigation may include:-
 - An informal talk with the child, young person or vulnerable adult.
 - A formal police recorded interview following disclosure.
 - A medical examination.
 - Preliminary assessment.
- If there is sufficient concern, a Child Protection Conference or similar meeting will be held to decide the best course of action to protect the child, young person or vulnerable adult and help the family.
- There may be criminal prosecution of the abuser.

Where there is a complaint against a member of staff, there may be three types of investigation:

- a criminal investigation;
- a child protection investigation;
- a disciplinary or misconduct investigation.

The results of the police and child protection investigation may well influence the disciplinary investigation, but not necessarily.

If, following consideration, the allegation is clearly about poor practice, this will be dealt with as a misconduct issue.

ANNEX B – Most recent updates

Updates made in Sept 2025

- Utilising the 'Keeping children safe in education', Department for Education, from 1st Sep 2025
https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf
- Update the name and contact details of the new DSL.
- Reference to include relevant topics on healthy relationships, consent,

and online safety in tutorials in relation to peer-on-peer abuse.

- Addition of misinformation, disinformation, and conspiracy theories to online safety risks and reference to ensuring staff and learners are equipped to identify and respond to this type of harmful online content.
- Reference to the use of generative artificial intelligence (AI) and alignment with the DfE's 'Generative AI: product safety expectations' guidance, and that existing filtering and monitoring systems apply to and are effective for all AI tools used within the setting.
- Reference to placing a child in alternative provision and obtaining written confirmation of appropriate staff safeguarding checks and details of any arrangements that may put the child at risk.
- Alignment of attendance procedures and strategies with the Department for Education's statutory guidance, 'Working together to improve school attendance'.

Updates made in Sept 2024

- Utilising the 'Keeping children safe in education', Department for Education, from 1st Sep 2024
- Amending the definition of 'safeguarding and promoting the welfare of children' in line with Working together to safeguard children, highlighting the importance of early intervention, protecting children from harm, and promoting their welfare. The term "exploitation" has also been added to the definition.
- Providing additional information on when children may require early help, in accordance with the guidance in Working together. The guidance places a greater emphasis on identifying students who may be at risk, even if they don't show obvious signs of distress.
- The definition of radicalisation has been updated to "the process of a person legitimising support for, or use of, terrorist violence". The wording has also changed to "susceptible to radicalisation into terrorism" instead of "susceptible to an extremist ideology".
- Being aware of the recommendation for staff, governors and trustees to use the DfE Data Protection guidance to understand data protection
- Clarification that schools continue to be responsible for the safeguarding of pupils they place with an alternative provision provider.

Change of section relating to ESFA and updated to reflect role of DfE in reporting of serious safeguarding allegations and situations.

Updates made in Sept 2023

Explicitly tell job applicants about online searches

- Schools and colleges must let potential candidates know that online searches will be done as part of due diligence checks ahead of their interview. YMCA / Discovery's HR Consultant has been explicitly made aware of the new protocol, as have department Managers.
- This will help to provide reassurance that they can and should be conducting online checks of potential new hires to check for any public incidents or issues that might need to be discussed ahead of a hiring. It will also help candidates to prepare to answer questions around public incidents from their history.

Have clarification on filtering and monitoring online activity.

- Recommendations provided regarding online filtering and monitoring software to keep tabs on what sites pupils are visiting or trying to visit. Three notable changes in the guidance state that:
 - Designated safeguarding leads (DSL) are responsible for understanding the filtering and monitoring systems each school has in place. This means that DSLs need to take the time to understand the kinds of websites students are visiting, for example.
 - An understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring" should be included in safeguarding and child protection training at induction for all staff.
 - Each school's child protection policy should include how appropriate filtering and monitoring technology on school devices and school networks form part of its policies.
 - YMCA Plymouth / Discovery College currently use 'Securly ' & 'Google Workspace' as our main filter and monitoring system.

Have clarification on allegations against agencies and individuals

- These might be allegations from community groups, sports associations or other service providers running extracurricular activities.
- The KCSIE update serves as a reminder to follow your own safeguarding policies and procedures and to inform the local authority designated officer (LADO) if a safeguarding allegation is made by your school against an external individual or organisation. Locally in Plymouth, the 'Gateway' has been disbanded, so referrals to the Early Help Team /

MASH is now the preferred method of raising concerns.

- The DSL has given a 'crib-sheet' to all Safeguarding Leads outlining the necessary steps / contact details.

Have clarification on pupils that are absent

- Another key update highlights that schools must have clarification that pupils who are absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. YMCA / Discovery's CFC system already accounts for absenteeism, with concerns raised being recorded on CPOMs.

Updates made in 2022 included:

- incorporating the DfE's advice on Sexual violence and sexual harassment between children in schools and colleges⁴
- setting out the safeguarding implications for schools of human rights and equality legislation
- providing more information on managing low level concerns
- reinforcing the importance of talking to parents about children's access to online sites when away from school.

ANNEX C – Information sharing

The seven golden rules of sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018, you

may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgment on the facts of the case. When you are sharing or requesting personal information from someone, be clear about the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information-sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.