

Safeguarding Children and Young Adults Policy

(Incorporating the procedure for the referral of wellbeing concerns, including disclosures related to abuse or the Prevent Duty)

Background

Make UK fully recognises its duty toward safeguarding and promoting the welfare of vulnerable young adults.

The aim of this policy is to establish a “whole organisation” approach to safeguarding vulnerable young adults, in order to:

- Providing a safe, supportive, inclusive, and stimulating environment of which we can all be proud.
- creating an atmosphere where all learners feel listened to and valued.
- Identify learners who are suffering or likely to suffer significant harm and ensure appropriate action to preserve their safety at Make UK and in the wider community.
- Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection
- Make UK will strive to prevent abuse and neglect by ensuring that the ethos and atmosphere of is conducive to a safe environment.
- Learners will feel supported and able to report safeguarding concerns to any member of staff. Staff will feel they are supported by colleagues and the Senior Management Team, including the Governance Team, and are able to report, seek advice and guidance on any safeguarding concerns, including those regarding colleagues or themselves.
- Safeguarding will be reflected throughout the curriculum which inspires, engages, and motivates our learners.

Purpose and aim of our policy

Our aim is to protect learners and staff from physical, sexual or emotional abuse, neglect and bullying and from dangers such as radicalisation and terrorism as identified under Prevent.

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

Scope of this policy

This policy applies to all MAKE UK’s employees, learners and independent contractors and persons acting on behalf of MAKE UK. Whether they work or study in the main Aston Skills site, employer provisions, remotely (e.g. home working) or other designated areas, and governors.

- The policy applies to learners on work experience and those engaged on any off-site activity.
- The policy applies to working arrangements with other agencies to support the Safeguarding Policy, including local education authorities, schools, support agencies and employers.

Definition

Children and young people - those aged under 18 years

- Adults at Risk – anyone aged 18 years of above who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation.
- LADO – Local Authority Designated Officer

- Work experience – short and clearly defined as work experience with the aim of improving employability skills as well as curriculum focus if appropriate.
- Work placement – learners undertaking work placement over a long period of time (one or two days per week over a period of two months or more)

Safeguarding Adults at Risk:

Make UK is not subject to the provisions of the Care Act 2014, we draw broadly on this act to inform its policy on safeguarding Adults at Risk. We will play our part to:

- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.
- Ensure that the wellbeing of the Adult at Risk is promoted and that in deciding on any action to be taken we will take into account their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

However, we recognise that Adults at Risk sometimes have complex interpersonal relationships and may be indecisive, unclear, or unrealistic about their personal circumstances and may not fully appreciate potential risks to their safety or well-being and therefore it may not always be possible to fully defer to their wishes when seeking the best way forward.

This policy should be read in conjunction with the following Make UK policies and procedures:

- Disciplinary Policy and Procedure
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy
- Dignity at Work Policy
- Disclosure and Barring Service Policy
- Data Protection procedures
- Welfare and Mental Wellbeing of Young People Policy
- Behaviours Policy
- Data Protection Policy

Statutory and legislative guidelines

We will ensure that we will respond effectively to legislation and guidelines typically, but not exclusively, as contained in

- Equality Act 2010
- Keeping Children safe in Education (2023 and its subsequent revisions)
- Working together to Safeguard Children (2020 and its subsequent revisions)
- The Children Acts of 1989 and 2004
- The Education Act (2002) Section 175
- The Education and Welfare Act 2021
- Human rights Act 1998
- Drugs strategy 2021
- Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- The Health and Safety at Work Act 1974
- The Rehabilitation of Offenders Act 1974
- Counter-Terrorism and Security Act 2015

- Safeguarding and Safer Recruitment in Education (2012)
- Safeguarding Vulnerable groups Act (2006)
- Sexual Offences Act (2003)

How we ensure our approach to safeguarding is effective

- We have a team of Designated Safeguarding Leads within Make UK and across the country who are all DSL trained with designated responsibilities.
- A safe environment is provided for learners at all times.
- Learners who are at risk of and/or likely to suffer significant harm are identified, and appropriate action is taken. This includes the risk of radicalisation as noted in the Prevent duty.
- Staff are made aware of issues relating to the welfare of learners

Designated Lead for the safeguarding and Make UK Deputy Lead for the safeguarding and Make UK

Jayne Griffiths Contact details.
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Safeguarding Officers are

Rhonda Hannon

Arjinder Bahia

Neil Ellor

Yasmin Prescott

Lawrence Walters

Reporting Mechanisms

All staff, and governors at Make UK, are responsible for the operation of this policy. Staff have a legal duty to report any disclosure, allegation or suspicion of abuse, to the Designated Safeguarding Lead/s or, in their absence, their Deputy.

This must be done immediately following the disclosure or suspicion is made or arises. It can be raised through My Voice which is accessible to all staff/learners visitors via posters displaying the QR code around the centre. Student handbook. Smart assessor, and Moodle.

A member of the safeguarding team is always available on Aston site.

My Voice will send a notification to the Designated Safeguarding Lead and Deputies, who will allocate the case to one of the other team members.

The case will be opened on My Concern.

The Designated Safeguarding Lead/s team

- We assess risks which may make our learners and staff vulnerable to abuse or exploitation.
- We consider whether a child or young adult is a risk of abuse in situation outside of their families.
 - Extra Familial are takes a different form for example.
 - sexual abuse (including harassment and exploitation),

- domestic abuse in their own intimate relationships (teenage relationship abuse),
- criminal exploitation, serious youth violence, county lines and radicalisation.
- We offer guidance to learners' employers and ensure they have a single point of contact
- Residential learners receive a risk assessment and those learners who require support are supported.
- We ensure that our safeguarding policy and supporting procedures and documents are regularly reviewed to comply with changes in legislation.
- All staff, including members of our governing board, have been trained in safeguarding and prevent.
- Staff receive updates both written and face-to-face.
- We encourage debate among staff at all levels to confirm and share understanding
- We offer guidance to learners on safeguarding and on how to raise concerns
- We offer advice and guidance to tutors on how to promote safeguarding-related concepts including the promotion of British values
- We monitor through formal reviews how well we are responding to our safeguarding responsibilities and to the Prevent duty
- We maintain and review records of safeguarding incidents via a bespoke system, My Voice/My Concern.
- We have strong and effective safe recruitment procedures.
- Refer cases where a crime may have been committed to the Police
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Work closely with Mental Health Leads
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel Panel, Disclosure and Barring Service and/or police), and support staff who make such referrals directly.
- Have a good understanding and take the lead of the filtering and monitoring systems and processes.
- Are confident that they know what local specialist support is available to support those involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and are confident as to how to access this support.
- The importance of having an 'appropriate adult' to support and help a learner in the case of a police investigation or search

Supporting documents and procedures relevant to our commitment to ensure the effectiveness of our policy

Designated Safeguarding Lead – job description
 Records of training and updates for staff and board members
 Guidance to employers
 Safe recruitment procedures
 Advisory board reports
 Induction records
 Whistleblowing policy
 Code of practice
 Prevent referral process
 Welfare and Mental Wellbeing of Young People Policy

Extracts from the “Prevent Duty Guidance: for Further Education institutions in England and Wales”

Staff Responsibilities and Training

Staff involved in the delivery of the apprenticeship will be trained to understand their responsibilities and be aware of the signs of abuse, neglect, extremism and radicalisation so that they are able to identify cases where an individual may be in need of help or protection.

Staff are expected to familiarise themselves with the Safeguarding Policy and associated Policies and Procedures, and to alert the Designated Safeguarding Leads if they have any concerns about an apprentice.

Staff will be encouraged to recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability individuals may face.

All apprentices will complete an e-learning training session on Safeguarding and prevent. In addition, they will have information available to them on the intranet regarding terrorism and exploitation which will help to prevent them being drawn into terrorism.

Disclosure Barring Service (DBS) Process

Make UK has a duty to refer concerns to DBS if we have reason to believe that an individual poses a risk to our learners so that the DBS can evaluate these concerns.

The Compliance Manager is responsible for determining when such a referral is necessary. *(The process is explained fully in the DBS Policy)*

Wellbeing and Welfare of Young People

We have a dedicated team of staff to support learners with their Health and Wellbeing. All staff are trained on Mental Health in Education and have the facility to support a learner. A team of Mental Health First Aider are also available. Part of the safeguarding monthly meeting the welfare cases are discussed, with the team offering ideas and support to those learners with wellbeing concerns. *(The process is explained fully in the Welfare and Mental Health Policy)*

Staying Safe Online/ Filtering and Monitoring

The onset of internet and digital technology has presented huge opportunities, both to enrich the learning environment for apprentices and also allowing them to expand their personal horizons. However, third parties are able to access online content, which can be accessed in a number of ways. We have a role in guiding apprentices in how to use the internet safely and develop appropriate online behaviours.

It vital that apprentices are made aware of how they can protect themselves online and ensure the security of their personal data. Dangers can include bullying and abuse, revenge porn, grooming, identity theft, and viruses.

The four areas of risks

Content: is monitored by IT and reported back to the safeguarding team at each months safeguarding meeting. being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, misandry, self-harm, suicide, antisemitism, radicalisation, and extremism.

Contact: subjected to harmful online interaction with other users, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying)

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Learners enrolling on a Make UK programme will undertake Safeguarding Training which covers online awareness. Further online awareness training is provided throughout the year for learners.

To meet the Department for Education filtering and monitoring standards Make UK has purchased the Lightspeed system which meet the online safety criteria of the KCSIE. The system gives us the mechanisms necessary to safeguard and promote the welfare of learners.

Our staff

Will ensure that learners follow protocol with regard to appropriate use of the internet and that the reporting mechanisms to alert leaders to any breaches in filtering and monitoring is correctly adhered to.

How our employers should safeguard apprentices

Our employers are required to familiarise themselves with relevant government legislation and to ensure that they take appropriate steps to understand what safeguarding means in practice at their workplace and in the context of the responsibilities they have for the people they employ. Our employers should also have their own safeguarding policy of which apprentices should be made aware.

Employers should ensure that any staff working with apprentices in a position of trust are appropriate for the role and do not present any danger or threat.

Those employers who don't have a safeguarding Policy will adhere to Make UKs policy.

- Employers receive safeguarding and prevent training throughout the year.

Forms of Abuse in relation to children/Young Adults

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

Physical abuse is a form of abuse which 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 is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another

person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

Sexual abuse 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 physical contact, including assault by penetration (e.g. rape, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual harassment When referring to sexual harassment it is referring to 'unwanted conduct of a sexual nature' that can occur online and offline – this can occur both inside and outside of a learners Education.

Examples are:

- consensual as well as non-consensual sharing of nude and semi-nude images
- sharing of unwanted explicit content
- 'up skirting' (a criminal offence).

Sexual violence and sexual harassment can occur between two or more learners of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children.

Make UK has a **zero-tolerance approach** to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", or "just having a laugh", "a part of growing up" or "boys being boys". Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between a young person/s, and within a young person's relationships (both intimate and non-intimate), friendships and wider children associations. Child-on-child abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based and discriminatory bullying, but not limited to, gender-based violence. Online child-on-child abuse is any form of child-on-child abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, child-on-child grooming, threatening language delivered online, the distribution of sexualised content, and harassment.

Neglect 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. This involves the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child' or vulnerable adult's health or development.

Domestic violence or abuse can be psychological, physical, sexual, financial and/or emotional and includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members

regardless of gender or sexuality. It also includes so called 'honour'-based violence, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include acts of assault, threats, humiliation and intimidation, harming, punishing, or frightening the person, isolating the person from sources of support, exploitation of resources or money, preventing the person from escaping abuse, and regulating everyday behaviour. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Psychological or emotional abuse includes enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying.

Financial or material abuse includes theft of money or possessions, fraud or scamming, preventing a person from accessing their own money, benefits or assets, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money, denying assistance to manage/monitor financial affairs or to access benefits, misuse of benefits, false representation or exploitation of assets, misuse of legal authority, rogue trading.

Modern slavery includes human trafficking, forced labour, domestic servitude, sexual exploitation, such as escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to.

Discriminatory abuse includes unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation and other forms of harassment, slurs or similar treatment, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic.

Signs of abuse in young adults

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

LGBT (lesbian, gay, bisexual, transgender, and queer (or questioning)).

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff endeavour to reduce the additional barriers faced and provide a safe space for learners to speak out or share their concerns. All safeguarding leads are trained to listen and talk to learners.

LGBT inclusion is part of Make UK ethos and there is a range of support available to help learners who counter homophobic, bi-phobic, and transphobic bullying and abuse. For children and young people questioning their gender there remains many unknowns about the impact of social transition, as such, when supporting a gender questioning child, we will take a holistic approach and consider the broad range of their individual needs. Make UK will refer to the DfE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how best to support a learner who is questioning their gender.

Missing from Education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important we respond to persistently absences and support identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

Reporting a low-level concern and what are low level concerns?

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that a member of Make UK staff may have acted in a way that is inconsistent with our standard practice. This could include inappropriate behaviour outside of work.

Examples of low-level behaviour would include, but is not limited to:

- Being over friendly with a learner
- Having favourites
- Taking photographs of a child/learner on a personal mobile phone
- Engaging with a learner on a one-to-one basis in a secluded area
- Humiliating the individual

Low level concerns may arise as a result naivety, be accidental or unintentional, be the result of misinformed action, a failure to follow procedures, a lack of training or, more rarely, deliberate abuse.

What action should be taken?

Make UK has a legal duty to keep children safe and protect them from harm. The raising of low concerns is an opportunity for training and process improvement. Individuals raising a concern have an obligation to raise any safeguarding observation as part of our proactive safeguarding

culture. Safeguarding breaches can occur in any organisation and escalating low level behaviour concerns for discussion is an important element of our culture.

Individuals may self-refer an issue of concern. The raising of low-level concerns is a professional dialogue in line with good practice and should provide opportunities for shared learning. It is an important step if the person has found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Concerns should be submitted in writing. The person raising the concern should:

- provide a concise record including a brief context in which the low-level concern arose
- include details which are precise and accurate and contain as much information as possible relation to the incident.
- Rationale for your decision.

Reporting a safeguarding concern

If an apprentice discloses a personal safeguarding concern

If an apprentice reports a disclosure to staff, this should be responded to in exactly the same way as any other safeguarding concern. It is required by Law that if a disclosure is made, it cannot be ignored and must be reported with immediate effect.

Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Staff are encouraged to:

- Listen non-judgementally
- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of Make UK should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- Ask open-ended questions to seek enough detail to make a referral to the Safeguarding team
- Do not offer personal opinion or offer any advice
- Never promise confidentiality – Explain that you are duty bound to refer the situation to the Designated Safeguarding Leads
- Reassure the apprentice but do not make any physical contact
- Make every effort to have the conversation in a place where another colleague knows your location
- Inform the Safeguarding team immediately and don't share the information with anybody else


Appendix A – Code of Practice

When working with children and/or vulnerable adults, Make UK staff, learners, visitors and associates are expected to take account of the guidance below in the way that they conduct themselves.

- Consider the wellbeing and safety of learners in advance through proper planning and development of safe methods of working/activities.
- Wherever possible, work in an open environment with children where they can be seen by others.
- Avoid unnecessary physical contact.
- Avoid taking a child or vulnerable adult alone in a car on journeys, however short.
- Avoid taking a child or vulnerable adult to the toilet, unless another adult is present or another adult is aware (this may include a parent, or responsible person).
- In a situation where you are alone with a child or vulnerable adult, make sure that others can clearly observe you.
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.
- Avoid showing favouritism towards particular participants.
- Report incidents of alleged abuse to the Compliance Manager/Safeguarding Leads, and ensure that any allegations are recorded.
- Report any concerns about poor practice to senior management in the relevant department or to the Compliance Manager/Safeguarding Lead.
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support Make UK with regards to their responsibilities under the Prevent duty and provide advice and support on protecting learners from radicalisation;
- Report any accidents to the Health and safety Manager for recording and investigation where required.
- No personal relationships with a learner or vulnerable adult.
- It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”.
- Staff, learners, visitors and associates should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet.
- Only official Make UK social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar

functions should not be used to interact with children or vulnerable adults. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g. LOL).

- Do not make suggestive or inappropriate remarks to or about a child or vulnerable adult, even in fun, as this could be misinterpreted.
- Participate in training available to you to support you in your work with children and vulnerable adults.
- Do not take children or vulnerable adults to your home.
- Maintain confidentiality about sensitive information.
- Where it is necessary for staff, learners, visitors or associates to take photographs or video images of children or vulnerable adults, written consent must be obtained (from parents/guardians in the case of children) before these images are taken in order to comply with the Data Protection Act 1998. Personal details and photos which clearly identify an individual must only be published where he/she (or his/her parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs (e.g. when taking place in a sporting activity)

| Policy Author | Policy Signature | Last Review Date | Policy Date | Policy Review Date |
|---------------------------------------|---|------------------|----------------|--------------------|
| Jayne Griffiths Compliance Manager |  | August 2024 | September 2024 | September 2025 |