

P63 Safeguarding & Child Protection Policy

This should be read in conjunction with our P75 Prevent Policy, P42 Whistle-Blowing Policy, P37 Recruitment Policy and P18 Special educational needs and disabilities (SEND) Policy.

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1 KEY INTERNAL CONTACT DETAILS

E-mail: safeguarding@tchc.net

Phone: 01923 698430

Role	Name	Contact	Areas covered
DSL / Safeguarding Manager	Alex Pazik	07732 684738	All
Safeguarding Champion	Josie Wright	01279 648437	Basildon (Bowlers Croft)
Safeguarding Champion	Steve Wilding	01923 698430	Basildon – (Southgate)
Safeguarding Champion	Lynn Jackson	01923 698443	Dunstable
Safeguarding Champion	Jodie Thomas	01473 232257	Ipswich
Safeguarding Champion	Sophie Jones	01733 301164	Peterborough
Safeguarding Champion	Ella Collet	01923 698430	Thurrock
Quality Director	Claire Jeens	07545924586	All

2 KEY EXTERNAL CONTACT DETAILS

Role	Role
Support and Advice about Extremism	<p>Police EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 PREVENT ADVICE LINE 0800 011 3764 ANTI-TERROR HOTLINE 0800 789 321 ONLINE: met.police.uk</p> <p>Local Authority See external key contacts– List of Multi-Agency Safeguarding Hubs</p>
NSPCC Whistleblowing Advice Line	<p>ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk</p>
NSPCC Report Abuse in Education Advice Line	<p>TEL: 0800 136 663 EMAIL: help@nspcc.org.uk</p>
Disclosure and Barring Service	<p>ADDRESS: DBS customer services PO Box 3961</p> <p>HR0059 Safeguarding of Children & Vulnerable Adults Policy V5 20/02/2023 2 Royal Wootton Bassett SN4 4HF</p>

	TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
Multi-Agency Safeguarding Hub	See external key contacts– List of Multi-Agency Safeguarding Hubs
Local Authority Children’s Social Services	See external key contacts – List of Local Authority Children’s Social Services
Local Authority Designated Officer	See external key contacts – List of Local Authority Designated Officers

3 POLICY STATEMENT

This policy, applicable to TCHC Group Ltd, is updated annually and accessible on the company website. We prioritise safeguarding and the well-being of children, young people, and vulnerable adults, striving to prevent abuse. This commitment is ingrained in our company culture, and we maintain a vigilant "it could happen here" approach. **Safeguarding is everyone's responsibility, regardless of job role, hours, or department.**

All individuals are legally obligated to take any neglect or abuse concerns seriously and follow the procedures outlined in this policy. Learners with concerns about their peers or others' behaviour can use this policy for support. We are duty-bound to report concerns to the appropriate authorities for investigation and necessary action.

Employees must promptly inform their Line Manager if they or any adult in their household faces allegations related to safeguarding or abuse against a child or vulnerable adult. When in doubt, consult with the Designated Safeguarding Lead (DSL) as a first step.

The objectives of this policy are as follows:

- Ensure the safety of our learners through effective safeguarding measures
- Shield learners from harm and proactively prevent abuse
- Educate staff, volunteers, and associates about the protocol for reporting safeguarding concerns in accordance with this policy
- Embed with staff, volunteers, and associates in teaching roles their duty and obligation to educate learners about Safeguarding, including online safety, healthy relationships and Prevent.



*Source: Highspeed training

4 REPORTING SAFEGUARDING CONCERNS

4.1 How to report a concern

CPOMS is our electronic safeguarding system, essential for reporting concerns [CLICK HERE](#)

If you have seen or experienced something which you don't think is right and is concerning you, support is available, and we want to prevent this from reoccurring. We can only do this if concerns are shared, and we know that this can be challenging. You can now share your concerns with the Safeguarding Team by completing the Call Out a Concern online form and this can be completed anonymously if you wish to.

All concerns will be treated sensitively and confidentially. However, if an individual is at serious risk of harm, we may share information with other agencies such as the emergency services or social care.



StaffSafe is our electronic safeguarding system, essential for reporting concerns about other employees at TCHC Group Ltd [CLICK HERE](#)

Not reporting concerns can lead to personal and organisational consequences, including disciplinary action. Remember, if you're called to an inquest or child safeguarding review, both your decision-making and TCHC's reputation may be scrutinised.

While reporting concerns might be worrisome, failing to act could have more severe consequences. Always respond appropriately to any concerns, no matter how they come to your attention.

Top tips:

- Remain calm and reassure the person that they have done the right thing by speaking up
- Listen carefully and give the person time to speak
- Explain that only the professionals who need to know will be informed, never promise confidentiality if the learner is at risk of harm or danger
- Act immediately, and **do not** try to address the issue yourself
- Remember that it is not for you to decide whether a suspicion or claim is true; all instances must be taken seriously
- Remember it is not your role to ask the person lots of questions: it's the responsibility of the social care or the police to find out more information

Step 1	You must FIRST contact our internal safeguarding team by telephone as soon as possible and within 2 hours of the incident/disclosure, before any external agency. Unless there is immediate danger to the person/s concerned or public.
Step 2	If for any reason the safeguarding team does not answer the telephone call within the 2 hours, you must contact Alex Pazik and if you still cannot reach anyone as the event is not immediately life-threatening contact Claire Jeens.
Step 3	CPOMS is our electronic safeguarding system, essential for reporting concerns CLICK HERE
Step 4	The DSL will update CPOMS as soon as possible after the case has been raised and may contact you to discuss involving professional services such as social care.
Step 5	Any further updates to the incident must be recorded on our electronic safeguarding system under the existing case file.

Note: should you feel a learner, colleague, yourself, or any members of the public are in immediate danger, report to the police immediately and then contact the internal Safeguarding team.

4.2 Allegations against a member of staff

Where allegation or suspicion of abuse is discovered or disclosed by a learner or colleague, the HR department and the Safeguarding Team will carry out a risk assessment and contact other agencies such as the LADO, emergency services and/or Police, if appropriate.

Where there are allegations against staff it may be necessary to suspend them whilst an investigation is undertaken which may result in disciplinary action. No suspension should be invoked without a Director and the HR department being involved.

4.3 Data protection and confidentiality

TCHC is ISO 27001 and Cyber Essentials Plus certified, with strong data protection measures in place. Share safeguarding information using authorised systems or encrypted emails to ensure security.

Please review [Information sharing advice for safeguarding practitioners](#) guidance where you have any reservations in sharing information.

Ensuring the safety and well-being of children and adults at risk is paramount. Staff, volunteers, and associates often access confidential information to fulfill their roles. Some information can be highly sensitive. They must never misuse this information for personal gain or to harm a learner.

- All staff, volunteers, and associates must be aware that they can never promise a child/young person or adult at risk confidentiality, which might compromise the safety or well-being of the learner, or that of another.
- The DSL will disclose personal information about a learner to other staff, volunteers, and associates where it directly affects them or their everyday work. The DSL will make a judgement for each case about who needs and has a right to access particular information.
- All staff, volunteers, and associates must be aware that they have a professional responsibility to share information with other agencies to safeguard children/young people and adults at risk, in consultation with a DSL.
- Safeguarding records are subject to the Freedom of Information Act and the Data Protection Act. If there is any doubt as to the rights of any party to access information, TCHC may seek legal advice prior to releasing any information.

4.4 Monitoring and Filtering Systems

The company uses Smoothwall filtering and monitoring software on all devices, including laptops and mobile phones, for software management and addressing related cases.

Smoothwall effectively blocks harmful and inappropriate content without undue disruption to teaching and learning. This aligns with the company's monitoring strategy, specifically its Filtering and monitoring standards, to fulfill our safeguarding requirements.

Filtering and monitoring systems – responsibility list		
Name	Role	Responsibility
Alex Irvine	Head of IT	Manage the IT functionality
Alex Pazik	Safeguarding Manager	Manage the usage, review cases and act
Claire Jeens	Quality Director	Review filtering and monitoring provision at least annually

5 Designated Safeguarding Lead (DSL) Responsibility

1. **Overall Safeguarding Leadership:** The DSL is the designated point of contact for all safeguarding concerns within the organisation.
2. **Policy Development:** They contribute to the development and implementation of safeguarding policies and procedures.
3. **Training and Awareness:** Ensure that staff, volunteers, and associates are trained in safeguarding procedures and are aware of their responsibilities.
4. **Information Management:** Manage and maintain safeguarding records, ensuring confidentiality and secure storage.
5. **Reporting:** Report safeguarding concerns to appropriate authorities when necessary and follow up on cases as required.
6. **Coordination:** Collaborate with external agencies and professionals involved in safeguarding cases.
7. **Support and Guidance:** Provide guidance and support to staff, volunteers, and associates regarding safeguarding concerns and procedures.
8. **Monitoring and Compliance:** Regularly review and update safeguarding practices to ensure compliance with legal requirements.
9. **Communication:** Ensure effective communication with all stakeholders, including parents, regarding safeguarding issues.
10. **Continual Improvement:** Continuously assess and improve safeguarding practices to enhance the safety and well-being of children and adults at risk.

*This is not intended to be an exhaustive list.

6 DEFINITIONS

6.1 Child and Adult

A child is defined as ‘anyone who has not yet reached their 18th birthday’, including unborn children right up to teenagers.

A child with special educational needs and disabilities, can present additional barriers when recognising abuse and neglect in children with SEND.

An adult is defined as anyone who is over the age of 18.

6.2 Child in Need (CIN)

A child in need is defined under the Children Act as 'A child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services.; or a child who is disabled'.

The child's needs are high level or complex needs, longer term intervention from services is highly likely. Examples include families where the care of a child is felt to be inadequate or children with mental health issues.

Teaching staff must promptly inform their DSL of any children classified as a child in need or on child protection plans. The DSL should always be involved in these meetings.

6.3 Low level needs

Low-level needs are where the needs of the child are relatively minor and where services may be able to take swift action to prevent the problem from escalating. Examples include regularly missing class, poor behaviour, the family need help accessing services.

An Early Help Assessment (EHA) may be requested by social care carried out by a lead professional who already provides support to the child and family such as a GP, support worker, teacher or health visitor to help identify what the child's needs are and to learn which services are required which is usually triggered by concerns. It also needs to be undertaken in agreement with the child and their parents or carers and must involve the child, family, and other professionals. emerging needs.

6.4 Emerging Needs

Emerging needs are where a child requires a range of services to respond to their needs, such as education, health, housing, or police services. For example, misusing substances, inadequately clothed or pregnant.

6.5 Complex needs

Complex or serious needs are where a child could be at risk of serious harm, or their development damaged, if help and services are not provided. Where a child has complex needs it is likely the problems will need resolving urgently. Multiple agencies should be involved to help which will require coordination from social care.

6.6 Child Protection Concerns

Child protection concerns are where there is reason to suspect a child is suffering, or likely to suffer, significant harm because of abuse or neglect. The need to help the child is immediate. If any child protection concern is reported to a DSL it must then be referred to the local social care team.

Examples include unexplained injuries, suffering from neglect, had contact with someone who has been identified as a risk to children, at risk from sexual abuse.

6.7 Significant harm

The highest level of the safeguarding structure, this includes children requiring urgent or emergency protection.

In cases where the risk is severe, the child may be removed from home either by court order, police protection powers or by an agreement reached with the parents.

DSLs should work with the professional who has the concern to telephone social care without delay, following the LSP procedures. The referral then must be followed up in writing. The police should then be contacted if the concern involves a criminal act.

6.8 Consent

Consent is when a person voluntarily gives verbal permission to another for something to happen or agrees to do something. Consent can be withdrawn.

Consent is not given if:

- The person asked isn't saying anything
- The person asked is not sober
- The person asked didn't say no
- The person asked said yes earlier, is in a relationship and they didn't say no

[Watch this short video on consent!](#)

7 SEND

Please refer to our P18 Special educational needs and disabilities (SEND) Policy.

8 TYPES OF ABUSE

8.1 Physical Abuse

- Any use of violence e.g. hitting, pushing, pulling, kicking, spitting, biting, shoving, tripping up, 'accidentally' banging into someone
- Damaging, stealing, taking, hiding belongings and/or throwing them around e.g. money (taxing), belongings or coursework
- Forcing someone to take drugs.

8.2 Emotional abuse

- Ignoring, excluding, tormenting, insensitive jokes or pranks, damaging property belonging to another person, demanding money or property.

8.3 Sexual Abuse

Sexual violence is where a vulnerable person has not consented or could not consent or was pressured into consenting, into carrying out sexual acts on someone or having sexual acts performed on them. Including, rape, assault by penetration and sexual assault.

Sexual harassment, such as sexual comments, jokes, remarks, and online sexual harassment.

Sexting also known as youth involved sexual imagery.

Sexual violence and harassment and harmful sexual behaviour response within this policy is informed by research and conversations with police and social care settings.

8.4 Neglect

- Including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

8.5 Financial Abuse

- Including theft, fraud, exploitation, making them beg for money, forcing people to commit crimes for money, pressure in connection with wills, property or inheritance of financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

8.6 Verbal abuse

- Name calling, teasing, threats and intimidation, taunting, mimicking, sarcasm, being generally 'unfriendly', making someone look silly and making things up to get someone in trouble
- Ridiculing particular customs, music, accents or the dress of anyone from a different culture
- Offensive, racist graffiti, making silent or abusive phone calls and unkind practical jokes.

8.7 Silent bullying

- Ignoring someone/leaving them out, preventing someone from joining in, the spreading of rumours, threatening gestures and following someone around.

8.8 Racist bullying

- Racial taunts, graffiti, gestures
- Refusal to work with others because they are from a different culture.

8.9 Stalking

- Continued unwanted attention through personal contact (directly with you through your friends and family) telephone calls letters, emails, text messages and internet chat rooms.

8.10 Cyber bullying

- All areas of the internet, such as email, social media and internet chat room misuse e.g. posting insulting notices about someone
- Sending abusive text messages or emails
- Misuse of associated technology – e.g. camera and video facilities
- Happy slapping – the practice whereby a group of people assault a stranger at random while filming the incident on a mobile device, to circulate the images or post them online.

8.11 Mate crime

- Mate crime is defined as the exploitation, abuse, or theft from any vulnerable person by those they consider to be their friends
- Those that commit such abuse or theft are often referred to as 'fake friends'.

8.12 Child criminal exploitation

Common in county lines and occurs where a person or group of people take advantage of a child or young person under the age of 18 by abusing their power using threats or coercion.

8.13 Child sexual exploitation

Similar to child criminal exploitation, child sexual exploitation has a difference that it involves acts of a sexual nature which include grooming, youth involved sexual imagery and sexual harassment/violence.

8.14 Mental health

Be aware mental health problems are in some cases indicators of abuse.

8.15 Upskirting

Upskirting is an intrusive and invasive practice, which involves a person taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).

Upskirting is where a person takes a picture under a person's clothing without their permission. It is now a specific criminal offence in England and Wales.

Upskirting is a criminal offense.

8.16 Child on Child abuse

Child-on-Child abuse is any form of physical, sexual, emotional, and financial abuse, and forced control, between children, and within children's relationships (both intimate and nonintimate), friendships and wider peer 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 violence including, but not limited to, gender-based violence.

Examples of online Child-on-Child abuse would include sexting, online abuse, Child-on-Child grooming, the distribution of youth involved sexualised content, and harassment.

Children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND. These can include: – assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration, – the potential for children with

SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs, – communication barriers and difficulties, and – overcoming these barriers.

8.17 Sexual harassment

Sexual harassment is behaviour of a sexual nature that is unwanted. Sexual harassment must be either (a) have violated a person's dignity and/or (b) created a hostile environment for them.

Examples from **ACAS** include:

- flirting, gesturing or making sexual remarks about someone's body, clothing or appearance
- asking questions about someone's sex life
- telling sexually offensive jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment
- displaying or sharing pornographic or sexual images, or other sexual content
- touching someone against their will, for example hugging them
- sexual assault or rape

8.18 Sexual violence

Sexual violence is any sexual act or attempt to obtain a sexual act by using violence or coercion regardless of the relationship to the victim.

Sexual violence is rape, assault by penetration or sexual assault. Sexual harassment is unwanted conduct of a sexual nature. Harmful sexual behaviour is problematic, abusive and violent behaviour that is developmentally inappropriate and may cause developmental damage.

TCHC have zero tolerance of sexual harassment and sexual violence. If you see something, say something, and report it.

8.19 Online abuse

Online abuse is any type of abuse that happens on the internet. It could happen on any device that is connected to the internet. For example, computer, laptop, mobile phone, tablet and smart watch etc. Anyone who uses the internet is at risk from online abuse.

Types of online abuse can be cyberbullying, emotional abuse, grooming, sexting, sexual abuse or sexual exploitation etc.

Signs include:

- People may spend a lot more or a lot less time than usual online.
- They could seem distant, upset or angry.
- They may be secretive about who they are talking to or what they are doing.
- They may have lots of new phone numbers, text messages on their device.

9 ONLINE SAFETY AND DIGITAL EDUCATION

Technology has become a very real and dangerous component of many safeguarding issues. For example, child sexual exploitation; radicalisation; sexual predation. With online tools being used more and more for educational as well as social uses it is important we ensure learner, staff, volunteer, and associate safety is a priority when working online.

The three main areas are:

1. **Content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views.
2. **Contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
3. **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying.

All staff, volunteers, and associates are responsible for staying safe online and encouraging others to do the same. Teaching staff must embed this within their lessons and draw attention to the TCHC poster with top tips of how people can Stay Safe Online.

Remember to remove any personal items from the camera view, that may be people and encourage learners to use the blurred background on Teams so that their background is safe and free from falling into the wrong hands.

Set ground rules with learners that include online safety it is embedded into their learning. Include YouTube clips of sexting as an example. Hold discussions around online safety and include the do's and don'ts online, scenarios can be ideal for this as learners will need to think about what they would do in the same situations.

Make sure learners are aware of who they can report to both when in centre or appointments with you, but also share what they can do when they are at home and things happen. Check local resources and support groups or ask the Safeguarding Team for suggestions. For example, encourage learners to get creative and devise internet safety posters and/or leaflets to display in centres or workplaces if employers agree.

Any child under the age of 18 years old must have a parent, guardian, or carer present BEFORE any audio or visual footage of them is recorded by teaching staff unless consent has been provided by them beforehand. No learner should be audio or video recorded without prior written consent, one consent form per learner will be sufficient for all lessons thereafter. Written consent should be gained at the start of their programme.

Please refer to TCHC's 'Protocol for Online Meetings' document for further information available on BrightHR.

10 SAFER RECRUITMENT

TCHC carries out safer recruitment checks on everyone that works for us.

- verifying identity and any academic or vocational qualifications
- obtaining professional and character references

- checking previous employment history
- ensuring that a candidate has the health and physical capacity for the job
- undertaking an interview
- undertaking any mandatory vetting and barring checks including where appropriate DBS and prohibition checks every three years of employment

Disclosure and Barring Service (DBS) enhanced checks are carried out by our HR department when new staff, volunteers, and associates join us.

All interviewees need to show an understanding of safeguarding that is relevant to the role that they are applying for, the interview panel are responsible for ensuring they cover safeguarding during any interviews.

Leaders and Managers must ensure that volunteers complete safeguarding training before beginning any role at TCHC. Volunteer identification should be verified, and a copy retained by HR.

Volunteers with current DBS checks should provide them to HR and their Line Manager. If a volunteer lacks a current DBS check, they must obtain one at their expense unless otherwise agreed in writing by TCHC.

Before starting work, all volunteers must have two satisfactory references obtained by HR. A risk assessment should be conducted by the DSL after the volunteer begins their work.

The HR department maintains the Single Central Register with this information.

10.1 Training

Induction and training are in line with advice from Multi-Agency Safeguarding Hubs, Education and Training Foundation, DFE guidelines for Further Education, and Local Authority Safeguarding Teams.

All new staff, including temporary and contracted staff, will be provided with induction training that includes:

- the safeguarding policy (including the policy and procedures to deal with child-on-child abuse);
- the role and identity of the DSL(s)
- the behaviour policy;
- the staff code of conduct including the Company's whistleblowing procedure and the associated IT policies, staff/learner relationships and communications including the use of social media
- the safeguarding response to children who go missing from education;
- a copy of Part one of KCSIE at least

All staff, volunteers, and associates must be supervised with learners unless the following tasks have been completed and they have a valid enhanced DBS check.

- Meet with the DSL
- Training completed according to their role
- The Safeguarding and Prevent Policies have been marked as read on BrightHR
- Keeping Children Safe in Education (2023) - Part One has been completed using this declaration:
[CLICK HERE](#)

All staff members undergo refresher training on safeguarding and child protection throughout their employment with TCHC, at least annually, to keep them up to date with current knowledge to safeguard children (for example, via e-learning and training).

I am a new employee and have already undertaken safeguarding training recently, do I have to redo it?

You must contact your DSL and ask them. Your DSL will ask you questions to establish when the training took place, how you attended the training, what proof you have of attending, what topics were covered to see if the training was of good quality and if it was fully understood. A DSL will not agree to you being exempt from all training, if any is agreed it will only ever be for an element or two of the full training we provide.

10.2 Single central register (StaffSafe)

The HR department is responsible for ensuring the company single central record is always maintained.

HR must ensure there are no errors on the single central record and if there is a minor administrative error such as a missing date on the record or information that TCHC clearly hold but is not transferred onto the single central record this must be rectified within 2 working days or sooner. In all cases of errors identified then safeguarding@tchc.net must be notified the same day by email.

No allowances will be made for breaches to the requirements for the Disclosure and Barring Service (DBS) disclosures not being in place for staff, volunteers, and associates. New staff that join TCHC should complete and submit their application for an enhanced DBS by the HR department on their first day of employment and a risk assessment should be completed by the Line Manager/HR.

No staff, volunteers, and associates without an enhanced Disclosure and Barring Service (DBS) check should be left unsupervised.

The DSL is responsible for spot checking the single central record throughout the year to ensure that statutory requirements are met.

11 TCHC PREMISES

All external visitors to our centres and offices need to sign into the centre on arrival, wear an identification badge or label to identify themselves and should always be accompanied by staff.

12 RISK ASSESSMENTS

It is important when working with children, young people, and vulnerable adults that you are in possession of case history and as much background information as you can collect about them. This information will provide you with evidence of whether a formal Risk Assessment is carried out before engaging with that person.

When a Risk Assessment is carried out it must be recorded on the TCHC template which can be obtained from safeguarding@tchc.net.

Any external activities must be signed off by the Line Manager at least one week before the activity is due to take place so appropriate measures can be put in place with the safeguarding team. The organiser is

responsible for ensuring this process is adhered to including that the activity is timetabled, a risk assessment has been completed in advance and an off-site register has been completed.

Any formal education trips outside of the classroom must be approved by the Director of Youth Programmes prior to being formally arranged.

13 OUT OF HOURS TEACHING

At times there may be a need for teaching to take place outside of normal business hours (Monday to Friday 08:30am – 5:30pm), where this is the case an e-mail should be sent to safeguarding@tchc.net to inform of the reason, date and time and any agreed measures taken by their Line Manager.

When the training entry is created in the outlook calendar the safeguarding e-mail address (safeguarding@tchc.net) should be added as a required invitee. If anyone is unsure how to do this, please contact IT support.

Learners must always sign in when visiting an office or centre when they enter the building for security and safety reasons.

14 PERSONAL AND PROFESSIONAL CONDUCT

14.1 Personal relationships

We recognise that, from time to time, close personal relationships may develop between members of staff, volunteers, and associates. To ensure that potential conflicts of interest are avoided, employees are required to inform their (line manager/HR department) of any relationship which may affect their work or compromise the business in any way.

No personal relationships are allowed with service users. If you have a prior personal relationship with a service user, before they became a service user, you must report this to your (line manager/HR department).

Any such information will be treated in the strictest confidence. We fully acknowledge the right of employees to privacy in their personal affairs. However, experience has shown that the effect of such relationships can cause a blurring of judgement whereby conflicts of interest arise.

14.2 Learner contact

Staff, volunteers, and associates are not permitted to see learners outside of the teaching/workplace environment.

Staff, volunteers, and associates are not permitted to add learners as friends on social media platforms such as Facebook. Staff and associates are not permitted to accept friend requests from learners.

No member of staff, volunteers, and associates are allowed to invite or accompany any learners in a private car. There may be extreme circumstances where teaching staff may need to accompany children, young people or adults at risk to another location e.g., home address or hospital. In this case they must contact the Safeguarding Team to inform them. Two staff members should escort learners. Where it is not possible for two staff members to escort a GAPS learner the Director of Youth Programmes must have provided approval for a staff member to go alone, and a risk assessment completed.

If an apprentice or short course learner falls ill and should go to hospital, then the Tutor must involve the DSL so that approval is granted ahead of any decisions being made. If the learner is in immediate danger the emergency services should be contacted first.

Staff and associates must liaise with the local authority where transport is provided for young people with EHCPs and the Safeguarding Team should be involved.

Staff, volunteers, and associates should not be accompanying learners on public transport such as trains, buses, and taxis etc. If this is necessary, then the Safeguarding Manager must be consulted.

All staff, volunteers, and associates must follow personal and professional conduct which includes no unnecessary physical contact with learners and vice versa. If you see something and feel safe to do so, please address it immediately.

Examples of unacceptable physical contact include but are not limited to:

- Tickling
- Stroking
- Playing with or styling hair
- Removing clothing
- Touching learners' skin in a suggestive way
- Invading personal space
- Or any other sexual conduct

Examples of acceptable physical contact include but are not limited to:

- 'No contact'
- Carrying out first aid

15 BOOKING EXTERNAL SPEAKERS

TCHC believe that external speakers can enrich learner's formal education and other areas of the business by adding depth and breadth on a wide range of subjects.

This form is to be used when booking external speakers [CLICK HERE](#).

Please ensure that you have familiarised yourself with our Safeguarding Policy and Prevent Policy prior to completing this form.

If you are unsure of anything when completing this form, please contact your line manager or the DSL for support.

It is the responsibility of the person inviting a speaker to ensure that all checks have been completed prior to the event taking place. The person inviting a speaker must check all resources thoroughly (look through every slide of a presentation, watch any videos from start to finish etc) and should contact the Safeguarding Manager if they have any concerns relating to the material.

All guest speakers should:

- Have been authorised by a TCHC Leader or Manager
- Where presentations are used, these must have been checked by TCHC staff before they are presented
- Follow the same signing in procedures as other visitors
- Always wear a VISITOR identification badge or label
- Never be left unsupervised
- Have their views challenged should they have any extreme views, whether political or religious

16 APPENDIX. MODERN SLAVERY

The Modern slavery awareness booklet from the Home Office published 17 October 2017 states ‘Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims. Modern slavery comprises slavery, servitude, forced and compulsory labour and human trafficking.’ The UK has legislation, which is designed to tackle slavery and human trafficking, the **Modern Slavery Act 2015**.

Types of modern slavery

- Sexual exploitation
- Domestic servitude
- Criminal exploitation
- Labour exploitation

Victims of modern slavery can be men, women, or children. They can be any nationality; the most common nationalities are from:

- Albania
- Vietnam
- UK
- Nigeria
- China
- Romania
- Poland
- Eritrea
- India
- Afghanistan

Indicators of a potential victim may include:

- Distrustful of authorities
- Expression of fear or anxiety
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Perception of being bonded by debt
- Passport or documents held by someone else

- Restriction of movement and confinement to the workplace or to a limited area
- Person forced, intimidated, or coerced into providing services
- Substance misuse
- Money is deducted from salary for food or accommodation
- Being placed in a dependency situation
- Inappropriate sexual behaviour
- Limited/sporadic school attendance (under 18s)
- No or limited access to bathroom or hygiene facilities

Please click this link to access for information about modern slavery:

<https://www.gov.uk/government/collections/modern-slavery>

17 APPENDIX. INFORMATION SHARING

The police hold important information about children who may be suffering, or likely to suffer, significant harm, as well as those who cause such harm. They should always share this information with other organisations and agencies where this is necessary to protect children. Similarly, they can expect other organisations and agencies to share information to enable the police to carry out their duties. All police forces should have officers trained in child abuse investigation.

Effective sharing of information between TCHC staff, associates, and local organisations and agencies is essential for early identification of need, assessment, and service provision to keep children safe. Serious case reviews have highlighted that missed opportunities to record, understand the significance of and share information in a timely manner can have severe consequences for the safety and welfare of children, including death.

TCHC staff and associates should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children. Whether this is when problems are first emerging, or where a child is already known to local authority children's social care (e.g. they are being supported as a child in need or have a child protection plan).

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.

All TCHC staff, volunteers, and associates should aim to gain consent to share information but should be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a practitioner has reason to believe that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. When decisions are made to share information TCHC staff, volunteers, and associates should record who has been given the information and why.

When receiving a request for information from the Police:

- Act only on the advice from your local DSL and the statutory agency
- Never view or share indecent images of any learners

- All requests for information from the Police should be in writing and should be signed by a serving Police Officer
- First check verification of the Officer who has made the request
- Consult with the Safeguarding Team and let them know exactly what information has been requested and if any reasons given for the request
- Log the request for information including all details such as who has made the request and what has been requested and why
- Check the ID of the officer when they arrive before handing over any information
- Information should be provided in a sealed envelope
- Log when requested information has been provided/picked up

18 APPENDIX. LEARNERS MISSING FROM EDUCATION

All staff and associates should be aware that learners and children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines (which is criminal activity in which drug dealers in major cities establish networks for the supply and sale of drugs to users in towns and rural areas, by using other people to carry, store and sell the drugs). It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Unauthorised absence and children missing from education procedure:

Teaching staff/associates and centre Administrators are responsible for recording learner attendance.

Leaders and Managers are responsible for checking teaching/training registers regularly and notifying the safeguarding team where learners miss more than four lessons in a row.

Designated Safeguarding Leads (DSLs) are then responsible for providing advice and support to staff, volunteers, and associates including agreeing actions. The DSL is responsible for following up with the Leader or Manager to ensure the matter has been resolved and the file can be closed. If the matter is ongoing the DSL must put interventions in place to resolve the issue.

If the learner and the next of kin are not contactable and other options have been exhausted, then other agencies may need to be informed, including the local authority contact or responsible person and any vulnerable or looked after child support agency.

Identifying vulnerability

For the purposes of this guidance, a wide definition of vulnerable and disadvantaged learners has been adopted. It includes, but is not limited to, learners who are in one or more of the following groups:

- learners with special educational needs (SEN)
- learners from minority ethnic groups who have English or Welsh as an additional language (EAL/WAL)
- care-experienced children, including looked after children
- learners educated other than at school (EOTAS)
- children of refugees and asylum seekers
- Gypsy, Roma and Traveller children
- learners eligible for free school meals (eFSM)
- young carers
- children at risk of harm, abuse or neglect
- learners with an EHCP
- learners with disabilities

19 APPENDIX. THE EVENT OF A DEATH OF A LEARNER

The death of a learner can be traumatic for both TCHC staff and other learners, we ask that the person informed about any learner related death reports this to the Safeguarding Team the same day using the normal safeguarding reporting system.

You may notice that lessons become disrupted as learners may be observed becoming restless and unable to concentrate. There may also be an increase in behavioural difficulties.

If any of the children or young people witnessed the death, irrespective of whether the learner died on TCHC premises or not, they may need to be referred for specialist help. Any specialist help for the child or young person will need to be discussed with their family or carers before any referral is made.

We understand that this can be a difficult time for our staff, and we suggest that you contact the Employee Assistance Programme (EAP) for professional support if you want to. The service is free of charge to staff and can include counselling sessions over the telephone and face to face.

Telephone: 0800 047 4097

How Can I Help?

- Reassure learners that we are there to listen to them and support them whilst they grieve.
- Talk to our Safeguarding Team about holding a memorial service for the learner who has died.
- If there are learners who wish to attend the funeral of the learner who has died discuss this with your DSL and ensure that the family and the family of the person who has died are in agreement.

20 APPENDIX. CONTEXTUAL SAFEGUARDING

20.1 Sexual behaviours continuum model

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse staff, volunteers, and associates can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond.

Hackett's continuum relates exclusively to sexual behaviours and is not exhaustive.

Sexual behaviours continuum model

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviour • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not able to be freely given • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour • Sadism

This could include, for example, whether it:

- is socially acceptable,
- involves a single incident or has occurred over a period.
- is socially acceptable within the peer group,
- is problematic and concerning,
- involves any overt elements of victimisation or discrimination e.g., related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability,
- involves an element of coercion, pre-planning, or involves a misuse of power.
- involves a power imbalance between the child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power, and

How can abuse be identified?

- failing to attend centre, disengaging from classes, or struggling to carry out centre related tasks to the standard ordinarily expected,
- physical injuries,
- experiencing difficulties with mental health and/or emotional wellbeing,
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much,
- broader changes in behaviour including alcohol or substance misuse,
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age, and
- abusive behaviour towards others.

*Abuse affects children very differently. The behaviour that children present with will depend on their circumstances.

20.2 TCHC tackles Child on Child abuse

Training includes case studies, educating people about the nature and prevalence of Child-on-Child abuse, positive, responsible, and safe use of social media, and the unequivocal facts about consent, via Personal, Social, Health and Economic (PSHE) education and the wider curriculum. For example, by addressing gender

inequality in a class, or by reviewing written work in an English class which addresses bullying and its effect on mental health.

Learners are frequently told what to do if they witness or experience such abuse. They are regularly informed about TCHC's approach to such issues, including its zero-tolerance policy towards all forms of Child-on-Child abuse.

Any response should:

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation,
- treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The Centre should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter,
- consider: – that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both within and outside the Centre); family; the Centre environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk, and – the potential complexity of Child-on-Child abuse and of children's experiences, and consider the interplay between power, choice, and consent.
- manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to consider the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

Where the DSL considers or suspects that the alleged behaviour in question might be abusive or violent the DSL should contact children's social care and/or the police immediately and, in any event, within 24 hours. Any report to IWF will be made in consultation with the police.

20.3 Youth involved sexual imagery

'Youth involved sexual imagery' best describes the practice because:

- 'youth involved' includes children sharing images that they, or another child, have created of themselves, and
- 'imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy), and
- a judgement of whether something is 'decent' is both a value judgement and dependent on context. The term 'sexual' is clearer than 'indecent', although the DSL will nevertheless always need to use professional judgement when determining whether a photo is 'sexual'. No TCHC staff, volunteers, and associates, including DSLs are permitted to view any suspected sexual imagery to determine any validity, this is a criminal offence.

- Creating, keeping and/or sharing sexual photos and videos of under-18s is illegal, and is classified as the making, possession, or distribution of indecent images of a minor - under the Protection of Children Act 1978 (making and/or distribution) and the Criminal Justice Act 1988 (possession).

20.4 What types of incidents are covered?

- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18)
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.
- A child is in possession of sexual imagery created by another child.
- The sharing of sexual imagery of children by adults constitutes child sexual abuse and centres should always inform the police.
- Children sharing adult pornography or exchanging sexual texts which do not contain imagery.
- Sexual imagery downloaded from the internet by a child.
- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult.

20.5 Incident involving youth involved sexual imagery recognised by TCHC:

- No staff, volunteers, and associates or DSL must view any suspected Youth involved sexual imagery to determine any validity of claims, this is a criminal offence as stated above.
- the incident should be referred to the DSL as soon as possible,
- the DSL will follow the procedures and guidance set out in Sexting in centres and colleges: responding to incidents and safeguarding young people,
- there should be subsequent interviews with the children involved,
- parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm,
- where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately,
- any report to the police should be considered against the severity of the concerns and/or allegations, the impact on any child who has allegedly experienced the abuse, and broader context of the production and distribution of the image (for example: was production consensual or coerced? Was sharing consensual? Was production volunteered or requested? What are the ages of the children involved?), and
- depending on the facts of the particular concern or allegation, a report to the police does not necessarily mean that the child will be criminalised. Since January 2016, the police can record an "Outcome 21" against a reported crime, meaning it is not in the public interest to pursue a charge. Most of the youth involved sexual imagery would fall into this category. However, in the event of coercion, exploitation, further harm, or aggravated behaviours, it is valid for police involvement to result in criminal charge.

21 APPENDIX. RECRUITMENT OF PRISON LEAVERS

- As an organisation using the Disclosure and Barring Services (DBS) and/or Disclosure Scotland to assist in assessing applicants' suitability for positions of trust, TCHC complies fully with the Disclosure and Barring Service/Disclosure Scotland Code of Practice (a copy of which is available on request) and

undertakes to treat all applicants for all posts fairly. TCHC will not discriminate unfairly against any subject of a disclosure on the basis of a conviction or other information revealed.

- We actively promote equality of opportunity for all, and we select all candidates for interview on the basis of their talent, skills, qualifications and experience. We welcome applications from a wide range of candidates, including those with criminal records.
- A disclosure is only requested where it is legally required or after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. Where a disclosure will be required from a successful candidate, all applicants will be made aware of this at all stages of the recruitment process.
- Where disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process.
- Unless the nature of the position allows the company to ask questions about a candidate's entire criminal record we only ask about "unspent" convictions as defined in the Rehabilitation of Offenders Act 1974.
- We will ensure that all those in the company who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We will also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of prison leavers.
- At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that may be relevant to the position. Failure to reveal information that is relevant to the position sought could lead to withdrawal of an offer or termination of employment.
- We undertake to discuss any matter revealed in a disclosure with the person seeking the position before withdrawing a conditional offer or terminating employment.
- Having a criminal record will not necessarily bar an applicant from working for us. This will depend on the nature of the position and the circumstances and background of the offences.

As the law is constantly changing, this policy is subject to review and TCHC reserves the right to amend this policy without prior notice.

USEFUL LINKS

[Mencap](#)

[Online sexual abuse](#)

[Are You A Victim Of Online Blackmail Or Sextortion?](#)

[Preventing youth violence and gang involvement](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

[Consent](#)

[Sexual harassment](#)

[What Is Cyberbullying](#)

[Domestic abuse: get help during the coronavirus \(COVID-19\) outbreak](#)

[Upskirting: know your rights](#)

[Mental health and wellbeing](#)

[Anti-bullying information](#)

[Workplace bullying and harassment](#)

[Female Genital Mutilation \(FGM\)](#)

[Forced marriage](#)

[Child sexual exploitation](#)

[Advice to parents and carers on gangs](#)

[Controlling or Coercive behaviour in an intimate or family relationship](#)

[Online Safety Guidance for Educational Settings](#)

[Children missing education](#)

[Preventing bullying](#)

[Drugs: advice for schools](#)

[Safeguarding children in whom illness is fabricated or induced](#)

[Hate](#)

This policy has been developed in accordance with the following guidance and legislation:

Prevent guidance:

[Counter-Terrorism and Security Act 2015](#)

[Channel and Prevent Multi-Agency Panel \(PMAP\) guidance](#)

[Revised Prevent duty guidance: for England and Wales](#)

Sexual violence and harassment guidance:

[Sexual violence and sexual harassment between children in schools and colleges](#)

[How to report rape and sexual assault](#)

[Help after rape and sexual assault](#)

General safeguarding guidance:

[Care and support statutory guidance](#)

[Modern Slavery Act 2015](#)

[Keeping learners safe 2015](#)

[Protection of Freedoms Act 2012](#)

[Education and Training \(Welfare of Children\) Act 2021](#)

[Information sharing advice for safeguarding practitioners](#)

Some of the main legislation and guidance for safeguarding children are:

[Keeping children safe in education 2023](#)

[Children Act 2004](#)

[Childcare Act 2006](#)

[Every child matters](#)

[Children and Social Work Act 2017](#)

[The Children, Young Persons and their Families Act, 1989](#)

[What to do if you're worried a child is being abused](#)

[Working Together to Safeguard Children](#)

Some of the main legislation and guidance for safeguarding adults are:

[Care Act 2014](#)

[Equality Act 2010](#)

[Human Rights Act 1998](#)

[Mental Capacity Act 2005](#)

[Safeguarding Vulnerable Groups Act 2006](#)



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P63	2.9	19/07/2022	Claire Jeens	Unclassified	19/07/2023
P63	3.0	09/08/2022	Claire Jeens	Unclassified	09/08/2023
P63	3.1	07/11/2022	Claire Jeens	Unclassified	07/11/2023
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