

SUTTON & DISTRICT TRAINING LIMITED

Safeguarding, Child Protection and Prevent Policy

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Introduction

Sutton & District Training Limited (SDT) recognises its responsibility to safeguarding and promoting the wellbeing of all children and young people under 18 (up to 25 for children with disabilities/SEN) and vulnerable adults including, those who are or may need community care and provide relevant support where they may be at risk of significant harm. SDT provides a safe environment for all children and vulnerable adults taking part in SDT programmes. This policy specifies how we will provide a safe environment and protect children & vulnerable adults whilst they are taking part in SDT programmes and other services.

SDT Directors, staff, volunteers, and contractors that provide services to SDT are also aware of these responsibilities.

SDT also aims to protect all staff, volunteers, apprentices, and contractors from situations where they may feel threatened or open to suspicion or accusation.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:

- Keeping Children Safe in Education (DfE, September 2022)
- Working Together to Safeguard Children July 2018
- The Prevent Strategy and Duty Guidance (HM Government, 2015)

All staff working directly with young people are expected to read at least part 1 of KCSIE 2022 those who do not work directly with children can now read the condensed version of part 1, annex A. This policy is supported by

- Equality & Diversity Policy
- Whistleblowing Policy
- Internet & Email Usage Policy
- Learner ICT Acceptable Usage Policy

Principal Safeguarding Responsibilities

The Directors – will have overall responsibility for ensuring the organisation meets its obligations within this area. They will be responsible for the approval of the safeguarding policy

The Human Resources department – will be responsible for ensuring that safer recruitment practice is embedded and implemented across the organisation and that all staff have received appropriate training and development.

The Designated Safeguarding Lead (DSL) Georgina Stanley and Deputy Designated Person (DDP) will be responsible for ensuring our processes and procedures for the protection of students are robust and consistently applied and that SDT fulfils its legal duties in compliance with the appropriate legislation.

All staff have a responsibility for completing their training, familiarising themselves with this Safeguarding Policy and for ensuring they understand their own role in the promotion of safeguarding and the appropriate action should they receive a disclosure. Staff should include Safeguarding as a cross cutting theme during their programme delivery to ensure they are implementing our policy.

The DSL will maintain and review the central record and DBS checks and report any individual to the DBS who poses a threat to children or vulnerable adults.

SDT will ensure that IT usage is monitored by using NETSUPPORT to alert The Study Programme Manager/DSL of any access being made to inappropriate material.

General Principles

SDT will ensure that:

Staff, leaders, and volunteers receive appropriate training on safeguarding at induction that is updated at least annually. This training as a minimum will include and enable them to recognise the signs and symptoms of abuse including Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) Female Genital Mutilation (FGM), Child on Child Sexual Violence and Sexual Harassment, Sexism and Sexual Harassment, Peer-on-Peer Abuse, and Honour-Based Violence (HBV)

Staff have training that gives them the knowledge and confidence to identify learners at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups. Staff will know where and how to refer children and young people for further help. Prevent awareness training will be a key part of this.

Designated safeguarding leads, and deputies should undertake safeguarding training every two years and their knowledge and skills should be refreshed at regular intervals, but at least annually.

Safe recruitment procedures are followed.

Curricula will embed the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

The names and contact details of the Designated Safeguarding Lead/Designated person are on display.

Measures are in place to minimise the risk of safeguarding issues occurring.

Staff have the knowledge of The London Child Protection Procedures (www.londoncp.co.uk) in relation to children who go missing from care, home and education.

Students undertake age-appropriate training related to safeguarding including how to protect themselves from a range of dangers including radicalisation, extremism, forms of abuse, grooming, criminal exploitation in relation to county lines, sexual exploitation, honour-based violence, bullying, cyberbullying and peer on peer abuse

Definitions

This covers children and young people under the age of 18 (up to 25 for children with disabilities/SEN and Care Leavers) including, who are or may need community care services because of age, illness, physical or learning disability, or those who are unable to take care of or protect themselves against harm or exploitation including those from whom English is an additional language.

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding and promoting the welfare of children is defined for the Children Acts 1989 and 2004 respectively as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Enabling children to have optimum life chances.
- Enabling children to enter adulthood successfully

Child protection is a part of our commitment to safeguarding and promoting the welfare of children and vulnerable adults and refers to the activities we undertake to protect specific children (or vulnerable adults) who are suffering, or are likely to suffer, significant harm.

The Prevent duty SDT is fully committed to its responsibilities under the Prevent Duty. As a result, SDT will:

- Assess the risk of learners being drawn into terrorism
- Protect learners from being drawn into terrorism
- Make sure that staff have training that gives them the knowledge and confidence to identify learners at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
- Ensure learners are safe from terrorist and extremist material when accessing the internet
- Establish a single point of contact for Prevent – the DSL
- Train staff to recognise radicalisation and extremism
- Refer vulnerable people to Channel as appropriate
- Have a clear policy about external speakers
- Where possible, have appropriate filtering systems to prevent access to extremist material

SDT policy in practice

Sutton & District Training are committed to good practice which protects children and young people under the age of 18 (up to 25 for children with disabilities/SEN and Care Leavers) Staff and volunteers accept and recognise their responsibility to provide an environment which promotes the safety, emotional and mental health and wellbeing of children and young adults always. All staff have a responsibility to keep children safe and remain vigilant.

To achieve this, we will:

- Develop an awareness of the issues which may lead to children or young adults being harmed.
- Create an open environment by having a “Designated Person” to whom the children or young adults can turn to if they need to talk. This person will also be the person for staff and volunteers to consult whenever they have a query or concern about a child’s welfare.
- Adopt safeguarding guidelines through codes of conduct for staff, volunteers and other Students at SDT.
- Ensure careful recruitment, selection and management procedures. These will include regular support and supervision is provided to staff/volunteers
- Ensure complaints, grievance and disciplinary procedures are included in our Management System
- Ensure good and safe working practices.
- Be involved in training made available through the various agencies and strengthen links with these agencies, and deliver our own Safeguarding training to staff and volunteers
- Keep the safeguarding and child protection policy under annual review
- Have procedures relating specifically to bullying, field trips, radicalisation and use of electronic media and photography
- Ensure that at least one Director has responsibility for safeguarding
- Report on safeguarding regularly to the Directors and prepare reports for the Advisory Board Meeting.

Reporting concerns

Safeguarding concerns should be reported to the Designated Safeguarding Lead using the agreed referrals form. If you wish to discuss a referral before completing the form, you may contact the Designated Safeguarding Lead by phone or discuss with your line manager. It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one because you are not yet certain. A register of Safeguarding risks is kept by the DSL and notification of any issues is immediately flagged to the DSL. A Safeguarding/Prevent Report is presented to the Board on a bi-monthly basis.

Code of Conduct

Following this simple code of conduct will allow SDT's staff working with children or vulnerable adults to avoid most situations in which they might be compromised.

You Should Always

- Respect the rights, dignity and worth of every individual and treat everyone with equality
- Ensure the welfare and safety of children and vulnerable people is your top priority
- Be a good role model
- Ensure that the activities you are leading are appropriate to age, maturity and ability
- Consider that children and vulnerable adults may have complicated and/or traumatic backgrounds which could make them sensitive to certain issues
- Recognise individual contributions and give positive, constructive feedback
- Remember that someone else might misinterpret your words or actions, no matter how well intentioned
- Take disclosures seriously and report them in writing as fully as possible

You Should Never

- Put yourself in a situation of risk; be aware of situations which may present risks and manage these.
- If possible, you should not be alone with children and vulnerable adults. Where possible plan and organise the workplace to minimise risks and as far as possible be visible in working with children and vulnerable adults.
- Behave physically in a manner which is inappropriate or sexually provocative.
- Use actions or language that may cause a child or vulnerable adults to lose self-esteem or confidence
- Allow allegations made by a child or vulnerable adult against you or someone else, even if the allegation refers to a child to go unrecorded or not acted upon.
- Publish pictures of children or vulnerable adults involved in SDT activities without ensuring you have their prior consent.

Staff Recruitment

All staff can be expected to have some contact with children, vulnerable adults and students in general, we will ensure that all staff and volunteers will:

- Be subject to a satisfactory Disclosure and Barring Service (DBS) check before taking up their post
- Have at least two work references which will be checked in line with best practice guidance.
- Receive a personal copy of this policy upon starting their job
- Be required to sign a copy of this policy to say they have read it
- Be informed of any changes to this policy

Visitors

All visitors ID will be checked on entering the building and issued a visitors' badge after signing in. A copy of our Safeguarding Policy will be held in reception.

Visitors will never be left with other learners; a staff member will always be present.

Physical Contact

Any physical contact between SDT staff, children or vulnerable adults is discouraged. However, it is acknowledged that some enthusiastic children or vulnerable adults may have physical contact with staff spontaneously. This is unavoidable but should not be encouraged and staff should not initiate unnecessary physical contact. Circumstances under which physical contact may be necessary are outlined below:

It is acknowledged that physical contact may be necessary to prevent children or vulnerable adults hurting themselves e.g., if someone is about to fall or run into an object. The nature of the contact which has taken place should be explained to the responsible adult.

Staff must not search children or vulnerable adults, or their property, without the approval of a responsible adult who should be present always. Searching of a young person or vulnerable adult would only arise if it was deemed that a dangerous item was being concealed by a young person or vulnerable adult and could cause damage/harm to others or themselves.

Physical contact may be unavoidable from an SDT first aider administering basic medical assistance. It is standard first-aid practice to explain the purpose of physical contact before carrying it out.

Responsible adults are responsible for managing the behaviour of the children or vulnerable adults in their care and for dealing with violence or inappropriate behaviour. However, if SDT staff are physically attacked or threatened they may take reasonable measures to protect themselves or remove the threat. If necessary SDT staff may ask responsible adults to remove children or vulnerable adults.

Allegations including Low Level Concerns

If a child or vulnerable adult should accuse a member of staff, or volunteer, of physical or sexual abuse, or any kind of inappropriate behaviour including low level concerns, this should be referred immediately to the individual's responsible adult and to the member of staff / volunteer's line manager. The allegation will be investigated before decisions are made regarding the appropriate route to take, i.e., internal investigation by Director (if the allegation is about the Director, it will be referred via the DSL to the Chair of the Board) or if the allegation meets the Harms Threshold it will then be reported to LADO.

If a member of staff is accused of physical or sexual abuse, or any kind of inappropriate behaviour, they may be suspended from work on full pay and the incident dealt with by their line manager. Incidents may be reported to the Local Authority Designated Officer as required by government guidance (liaise with the DSL for reference and expansion of this whole section if you need it) and the police which could lead to a disciplinary action being taken against the member of staff. However, should allegations be assessed as unfounded this will be noted on the staff file, which is subject to terms of the Data Protection Act 20.

Minimising the risk

SDT has an open environment where all our students feel happy and safe. We collect feedback from our students throughout the academic year to ensure we are fulfilling our obligation in providing a safe and secure educational setting.

We have dedicated pastoral workers in all centres and the designated safeguarding lead and designated person all have substantial knowledge of safeguarding. We have a student forum every term where students have the opportunity to talk openly about any difficulties or concerns that may arise throughout their time with us. Alternatively, they can speak to a member of staff in confidence. All students attend PSHE sessions which include units on safeguarding and whom to speak to if they are affected by any issues.

Medication & First Aid, Health & Safety

Staff should not give a child or vulnerable adult any kind of medication under any circumstances.

If a child or vulnerable adult requires First Aid at an SDT site, this must be provided by a qualified SDT First-Aider, with the assistance of the responsible adult where possible. If First Aid is required at an outreach event, the resident First-Aider should take charge; SDT staff may assist if requested.

In case of a medical emergency, the responsible adult should be consulted about calling for a paramedic/ambulance, but the decision is down to the attending First-Aider.

At SDT sites the SDT Health & Safety Procedure guidelines should be followed. All members of the public, but especially children or vulnerable adults, should not be allowed access to areas identified as potentially dangerous in risk assessment.

In any case of injury or accident on an SDT site should be reported and recorded using the accident book. Near-misses should also be recorded in the accident book, which should then be passed to your line manager to complete the entry. All accident books are kept in the main office at all SDT sites.

Photography

Photographs or videos of children or vulnerable adults (as individuals or in groups) where they could be recognised must not be taken or published without obtaining prior consent.

Disclosure

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

If a child or vulnerable adult discloses any information to SDT staff suggesting that they have been physically or sexually abused, staff should take the disclosure seriously, listen to the person and accept what is being said. They should not express shock, ask questions or make promises they are unable to keep e.g., to keep the information confidential or to stop the abuse from happening. They should inform the person at the beginning of the disclosure that they will not be able to keep the information confidential.

Any such disclosure should be recorded in writing in as much detail as possible straight after the incident and reported to the line manager. It is not the responsibility of staff to act on the disclosure themselves.

If a member of staff feels a child or vulnerable adult is at immediate risk, this should be included in reporting to the line manager as soon as possible.

Management of Information

SDT complies with the principles of the General Data Protection Regulations (2018) in the way it collects, holds, and disposes of personal information. Under the GDPR, anyone processing personal information must comply with principles of good information handling. The principles refer to:

- Lawfulness, **fairness**, and **transparency**
- **Purpose** limitation
- Data minimisation
- **Accuracy**
- Storage limitation
- **Integrity** and **confidentiality (security)**
- **Accountability**

For more information, please see the website of the Information Commissioner's Office.

Staff Declaration

I declare that I have received, read and understand this policy, and that I will abide by the code of conduct.

Signature:

Date:

DEFINITIONS OF ABUSE / NEGLECT / HARM

Physical Abuse

This may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of or deliberately causes, ill health to a child they are looking after.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children.

Neglect

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 such as failing to provide adequate food, shelter and clothing or neglect of or unresponsiveness to, a child's basic emotional needs.

Sexual Abuse

This involves forcing or enticing a child or young person to take part in sexual activities whether a child is aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts. For example, it may also include involving the child looking at, or being involved in the production of pornographic material or watching sexual activities or encouraging the child to behave in sexually inappropriate ways.

Child Criminal Exploitation (CCE)

Child criminal exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitated and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through use of technology.

Child criminal exploitation can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country this is known as county lines, forced to shoplift or pickpocket, or to threaten other young people.

Child Sexual Exploitation (CSE)

Child sexual exploitation is illegal activity by people who have power over children and young people and use it to sexually abuse them. This can involve a broad range of exploitive activity, from seemingly "consensual" relationships and informal exchanges of sex for attention, accommodation, gifts, or cigarettes, through to very serious organised crime. Children and young people at risk of sexual exploitation are some of the most vulnerable in our society. Many have experienced abandonment or have suffered from physical and mental abuse.

Children Missing from Education

Children missing from education are vulnerable and are at greater risk of being exposed to abuse such as travelling to conflict zones, radicalisation, Female Genital Mutilation (FGM), forced marriage, criminal exploitation in relation to county lines, gang involvement and trafficking.

Fabricated or Induced Illness

Fabricated or Induced Illness is a difficult and complex subject, but schools and colleges can play a key role in recognising concerns that may relate to this rare form of child abuse. Fabricated/induced illness occur when a child is presented for medical attention with signs or symptoms which have been fabricated or induced by the child's carer. Fabricated or Induced Illness is a spectrum of disorders rather than a single entity. At one end fewer extreme behaviours include a genuine belief that the child is ill. At the other end the behaviour of parents/carers includes them deliberately inducing symptoms by administering drugs, intentional suffocation, overdosing, tampering with medical equipment, falsifying test results and observational charts. Most of these symptoms will not be visible within the nursery/school setting but it is sensible to be aware of signs in case a child or another family member raises these issues.

The signs of Fabricated or Induced Illness can be ambiguous and may be attributed to other problems in the child's family that you may be aware of. School staff are particularly well-placed to notice outward signs of harm or to observe if a child is repeatedly unwell for no apparent reason. Or a discrepancy may occur when parents give a description of a child's ill health, which does not accord with your observation, and knowledge of the child in the nursery/school setting.

Risk to self and /or others

This may include but is not exclusive to self-harm, suicidal ideation, or potential risk of harming others, which may or may not include children. This may be because of an individual experiencing a significant level of personal, emotional trauma and or stress.

Financial or Material Abuse

Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse of misappropriation of property, possessions, or benefits.

Discriminatory Abuse

Is an action that denies social participation or human rights to categories of people based on prejudice.

Forced Marriages & Honour-Based Violence

These are marriage relationships conducted without the valid consent of both parties, where duress is a factor. If there are concerns that a student is in danger of a forced marriage the Designated Safeguarding Lead or Nominate will follow government guidelines and contact will be made with the "Forced Marriage Unit". Arranged marriage is an entirely separate issue and must not be confused with forced marriage. "Honour-based" violence is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community."

Domestic Abuse

The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse.

Female Genital Mutilation (FGM)

FGM is a form of abuse which has devastating physical and psychological consequences for girls and women. Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM or herself. The FGM Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. All staff have a mandatory duty to report disclosures on FGM about a female under 18 personally to the police.

Mental Health

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

Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem.

Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect or other traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy, and speaking to the designated safeguarding lead or deputy.

The Department of Education has published advice and guidance on Preventing and Tackling Bullying and Mental Health and Behaviour in Schools.

Child on Child Abuse

In most instances, the conduct of Students towards each other will be covered by our Behaviour Policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns.

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitive relationship, contexts and situations by peer who are also under 18.
- Harmful Sexual Behaviour – children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Serious Youth Violence – any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19 i.e., murder, manslaughter, rape, wounding with intent, and causing grievous bodily harm.
- There are also different gender issues that can be prevalent when dealing with peer-on-peer abuse (i.e., girls being sexually touched/assaulted, upskirting, or boys being subjected to initiation/hazing type violence.)
- The term child on child abuse can refer to all these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

Child on Child Sexual Violence and Sexual Harassment

All staff should recognise the impact of sexual violence and the fact that children can, and sometimes do, abuse their peers in this way. When referring to sexual violence this is referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: there is intentional penetration of the vagina, anus, or mouth of another person (B) with his penis, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.
- **Assault by penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina, anus, or mouth of another person (B) with a part of her/his body or anything else, the penetration is sexual, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, (B) does not consent to the touching and (A) does not reasonably believe that (B) consents.

Upskirting

Upskirting is where someone 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 highly intrusive practice, which typically involves someone 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 distressing and a humiliating violation of privacy for victims.

Bullying

Bullying is unwanted, aggressive behaviour among children under 18 that involves a real or perceived power imbalance. The behaviour is repeated or has the potential to be repeated over time. Both young people who are bullied and who bully others may have serious lasting problems.

To be considered bullying, the behaviour must be aggressive and include:

An imbalance of power: young people who bully use their power – such as physical strength access to embarrassing information, or popularity to – to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.

Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a reason e.g., size, hair colour, race, religion gender, sexual orientation, and excluding someone from a group on purpose.

Cyberbullying

Cyberbullying is the use of phones, instant messaging, email, chat rooms or social networking sites such as Facebook, Instagram, and Twitter to harass threaten or intimidate someone for the same reasons as stated above. It is important to state that cyberbullying can very easily fall into criminal behaviour under the communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene, or menacing, or false, used again for the purpose of causing annoyance, inconvenience, or needless anxiety to another could be deemed to be criminal behaviour. If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, SDT will have no choice but to involve the police to investigate these situations.

Remote learning

When teaching remotely it is essential to carefully consider your location, audio and camera settings when involved with remote learning to learners, this will help to always maintain a professional and responsible teaching session, even with face-to-face teaching on the computer. It is also recommended that you brief your learner on an appropriate dress code.

When a tutor is leading, or a student is joining a video-conferencing call or live streaming call from home remotely, they should choose a neutral location that is appropriate and safe, e.g., a living room, a study, or a kitchen. Encourage the learner to work from a suitable communal home location where they feel comfortable, preferably accompanied by their parent/carer, and suggest where possible that the lesson is not interrupted by other household members or pets. Carefully consider what is in the view of the camera, i.e., check that the background is professional and does not contain images or information that should not be shared or that could be deemed inappropriate.

It may be helpful to ask a staff colleague what is in the view of the camera. Where possible it is recommended that practitioners and learners change their background as standard practice.

Always be mindful that not all learners will want to switch their camera on – tutors should make turning the camera on optional.

Sexting

Sexting is when someone sends or receives a sexually explicit text, image, or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, regardless of their age, gender, or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003

Drug Abuse

Drug abuse is the recurrent use of illegal drugs, or the misuse of prescription or over the counter drugs with negative consequences. These consequences may involve problems at college, home or interpersonal relationships; problems with the law; physical risks to health; and physical risks that come with using drugs in dangerous situations. Staff should always refer to the safeguarding DP if they suspect a student is involved in drug abuse.

Prevent

The revised Prevent Strategy was released in **June 2011** with the full Contest Strategy being released in July 2011 and seeks to stop people becoming involved in terrorism. It is the preventative strand of the government's counter-terrorism strategy, CONTEST.

Objectives of the Prevent strategy are to:

Respond to the ideological challenge of terrorism and the threat from those who promote it
Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support

Work with sectors and institutions where there are risks of radicalisation that we need to address

If there are concerns that a student is becoming radicalised and involved in an organisation which could ultimately harm the student and the community, this needs to be reported to the Designated Safeguarding Lead or the Designated Person.

16 – 18 and 18+ Vulnerable 18+ Apprentices

Sutton and District Training has an Organisational Safeguarding Policy – this statement has been added to accommodate the needs of apprentices aged 16 – 18 and vulnerable 18+ adults. We have a statutory responsibility under current legislation “Keeping Children Safe in Education and Working Together to Safeguard Children which provides guidance on safeguarding and child protection. This statement should be read in conjunction with our main policy.

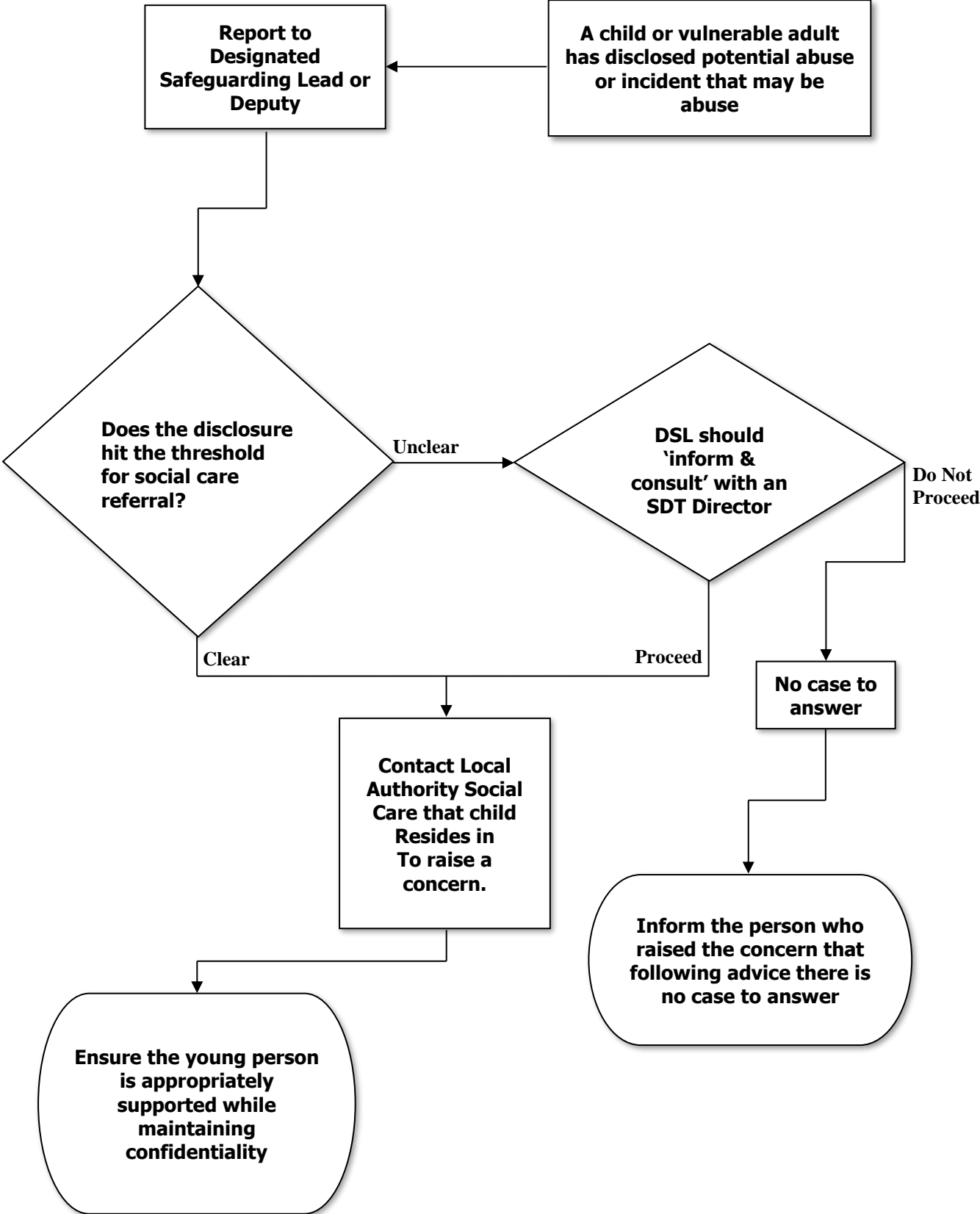
All our apprentices are employed from the first day of induction, we usually work with adults over 18 but have occasionally worked with young adults aged between 16 – 18. We are aware that it may be the first time our apprentices have been employed so we are mindful that we have a duty of care to ensure our apprentices are placed in appropriate settings, they may feel anxious or vulnerable, we will be available to support them every step of the way. SDT will work with the employer and ensure that all employers have been risk assessed for suitability including; Health & Safety, Induction, Safeguarding/Prevent and Rights and Responsibilities.

SDT ensures that apprentices who are aged under 18 or vulnerable adults 18+ are interviewed, inducted and trained by staff who have an enhanced DBS. Each apprentice will have a named assessor/person who will be in a position to assist with any learning or personal difficulties. Any apprentices who are under 18 or vulnerable 18+ adults are flagged to the DSL, who will have regular contact with the employer and apprentice.

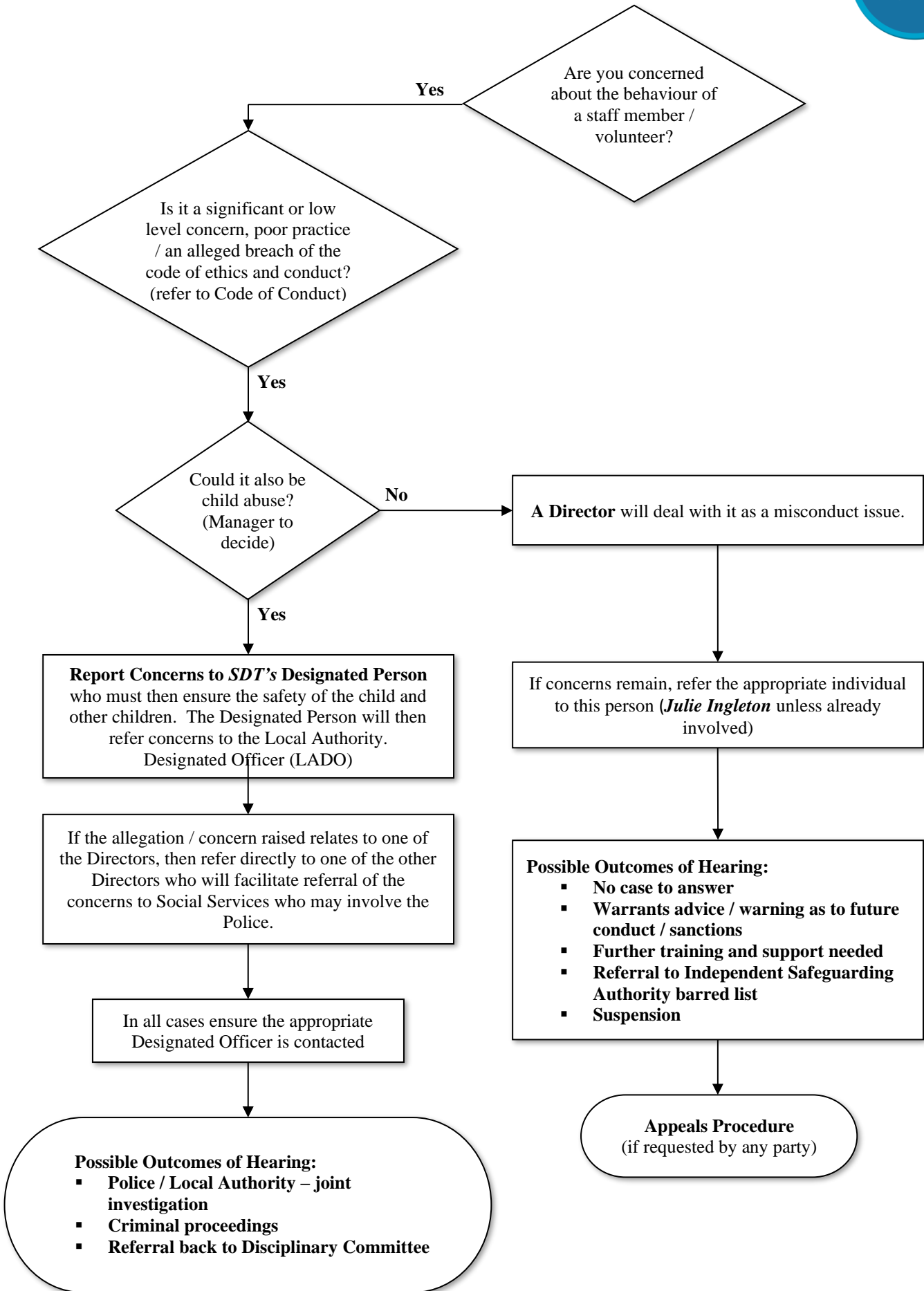
Part of the apprentice's induction training plan will include Ihasco on-line Safeguarding and Health & Safety modules together with embedded units within the qualification. During progress reviews we will have on-going dialogue including up-dates and discussions to raise awareness of current issues/topics. All staff who are in contact with apprentices undertake Safeguarding and Prevent Duty training to at least L2 and are confident to discuss and signpost apprentices if necessary.

Employers of apprentices must comply with our Safeguarding and Prevent Duty Policy and associated procedures. Our policy allows employers to acknowledge that SDT has a statutory duty to safeguard and promote the welfare of individuals under the age of 18 and 18+ vulnerable adults.

External Concerns Flow Chart



Internal Concerns flow chart



Prevent and Channel

Flow chart for reporting a concern of a Prevent @SDT

It is important for you as a member of staff to know where to go if you have a concern that someone maybe on the route to radicalisation. Below is a flow chart which aims to show the process to follow.

