Safeguarding and Prevent Duty Policy

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Introduction

All children, young people and adults at risk, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm or abuse.

In line with mandatory and statutory requirements, The Skills Network is committed to ensuring that it:

- Identifies young people and vulnerable adults who are suffering, or likely to suffer, significant harm
- Takes appropriate action to ensure that such young people and vulnerable adults are kept safe.

This policy provides guidance to all staff (and relevant sub-contractor and employer staff) to ensure the safety and well-being of all our learners and staff.

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

- The Children Act 1989
- The Children Act 2004
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2020
- What to do if you are worried a child is being abused 2015
- Protection of Freedoms Act 2012
- Care Act 2014
- Children and Social Work Act 2017
- Keeping Learners Safe 2015
- Safeguarding Children: Working Together Under the Children Act 2004
- Prevent duty Guidance
- Modern Slavery Act 2015.

A child is defined as someone under the age of 18 years unless he/she has defined special needs.

An adult at risk is aged 18 or over, and:

- Has need for care and support (whether or not those needs are being met)
- Is experiencing, or is at risk of, abuse or neglect
- As a result of those needs, is unable to protect him or herself against abuse or neglect or the risk of it.

Our commitment to safeguarding our learners:

- The Senior Leadership Team (SLT) understands and fulfils its safeguarding responsibilities.
- The Skills Network (TSN) has a Designated Safeguarding Lead (DSL), who reports to, and provides strategic guidance to, the Senior Leadership Team. The DSL is responsible for the development, practice and management of safeguarding within the organisation.
• All staff are required to undertake e-learning modules and will be provided with face to face safeguarding training within their probationary period. Refresher e-learning and/or face-to-face safeguarding training for all staff is mandatory every two years and refresher face-to-face intermediate training for all staff will be attended every two years. In-house face to face safeguarding training for all staff is provided by the DSL (or the Deputy DSL and/or Safeguarding Officers).

• All staff understand their roles and responsibilities relating to ensuring learners’ safety and well-being. They know how to respond to someone who discloses abuse and understand the required procedures when dealing with a potential disclosure.

Ensuring staff commitment to our Safeguarding and Prevent Policy will be achieved through a process of training and development. Senior staff are to lead by example and promote learner safety and welfare at every opportunity.

It is a statutory requirement that all staff read and understand at least Part 1 of ‘Keeping Children Safe in Education’, 2020. The DSL should ensure that all staff are fully compliant, and that they have a secure understanding of their roles and responsibilities.

• All key stakeholders are made aware of TSN’s safeguarding responsibilities. The current Safeguarding Policy is available on TSN’s website, and any further required information is available on request.

• TSN’s selection and recruitment procedure adheres to the principles of safe recruitment outlined in Keeping Children Safe in Education 2020 and includes all appropriate checks on employees’ suitability through the DBS process, as appropriate.

Responsibilities

TSN understands that to fulfil its responsibility to safeguard children/young people and adults at risk, all staff are required to undertake mandatory training and appropriately share any concerns that are identified or disclosed.

• We will immediately refer a person if there are concerns about his/her welfare, possible abuse or neglect to the appropriate agency where he/she resides. A Safeguarding Reporting Form (SRF) (Appendix 1) will also be completed and sent to the DSL immediately, and a written record of the referral will be forwarded to the relevant external agencies (where appropriate) within 48 hours of the disclosure.

The DSL will also ensure that:

• Written records about a child/young person or adult at risk are retained securely on the Safeguarding Referrals Database (SRD).

• All such records will be stored confidentially on a secure network. This will be monitored and managed by the DSL.

• Ensure that all staff (including sub-contractors/employers) receive regular updates on child protection, adults at risk and safeguarding, and that they receive refresher training as required.

• Internal notification procedures for reporting safeguarding referrals to the Senior Leadership Team (SLT) are followed consistently.
**Apprenticeships**

All employers will be expected to work collaboratively with TSN to ensure that all learners remain safe; this will include appropriate TSN staff undertaking rigorous risk assessments of the workplace.

Further measures will include:

- Employers’ commitment to safeguarding learners by endorsing, and following, an agreed statement of principles (including the delivery of an Employer Safeguarding Handbook)
- The requirements for DBS checks for appropriate employer staff and the relevant processes undertaken, where required
- Employers’ staff undertaking appropriate safeguarding training, where appropriate.

**Third-party providers**

Where a sub-contracted provider is used to deliver any aspect of training, we will check that they have robust safeguarding procedures in place. All staff must be trained in safeguarding and all employer premises are risk-assessed.

**Definition of abuse and wider abuse concerns**

**Sexual abuse**

**Children**

Forcing or enticing a child or young person, not necessarily involving a high level of violence, to take part in sexual activities, whether the child is aware of what is happening, or not. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside the clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males – women can also commit acts of sexual abuse, as can other children.

**Adults at risk**

Sexual abuse is the direct or indirect involvement of the adult at risk in sexual activity or relationships, which they:

- Do not want, or have not consented to
- Cannot understand and lack the mental capacity to be able to give consent to
- Have been coerced into because the other person is in a position of trust, power or authority (for example, a care worker).
Neglect

Children

The persistent failure to meet a child’s basic physical and/or psychological needs is likely to result in serious impairment of the child’s health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter, including exclusion from home or abandonment
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers) or ensure access to appropriate medical care or treatment.

It may also include the neglect of, or unresponsiveness to, a child’s basic emotional needs.

Adults at risk

Neglect and acts of omission, which may include ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, and/or the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Physical abuse

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, or otherwise causing physical harm to a child or adult at risk.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional abuse

Children

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

It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say and how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction.

It may involve seeing or hearing the ill treatment of others. It may involve serious bullying (including cyber bullying), causing children to frequently feel frightened or in danger; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Adults at risk

Psychological abuse, which may consist of emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation and/or unreasonable and unjustified withdrawal of services or supportive networks.
Sexual Exploitation

Children

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and may range from opportunistic to complex organised abuse.

Adults at Risk

Exploitation can be opportunistic or premeditated, and involves unfairly manipulating someone for profit or personal gain.

Radicalisation and Extremism

The Counter Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have due regard for the need to prevent people from being drawn into terrorism (‘the Prevent duty’).

Extremism: The holding of extreme political or religious views e.g. animal welfare rights, environmentalists, EDL/white supremacy groups, anti-gay groups, Islamic/Christian ideology.

All staff are required to undertake mandatory e-learning and face-to-face training; this provides employees with information on how to refer a concern using the Channel process. All employees will follow the Prevent Procedures (Appendix 5).

Honour-Based Abuse (HBA)

So-called ‘honour-based’ abuse (including Female Genital Mutilation and forced marriage) So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having experienced FGM.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
There is a range of potential indicators that a child or young person may be at risk of FGM. Individually, they may not indicate risk. However, if there are two or more indicators present, this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, this must be reported to the police and to the DSL immediately.

**Forced marriage**

A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the young people.

In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure.

**Bullying**

All incidents of bullying are taken seriously, and staff should refer to the Preventing and Tackling Bullying Procedures (Appendix 4) for further guidance.

**Peer on peer abuse**

Peer on peer abuse is most likely to include, but may not be limited to, bullying (including cyber bullying), gender-based violence/sexual assaults, upskirting, initiations and hazing and sexting.

Peer on peer abuse is harassment and aggression in which a young person intentionally threatens, harms or causes distress to another young person. This behaviour is intentional, repeated and designed to hurt or threaten. Peer abusers seek to abuse and terrorise defenceless others who may not have the ability or resources to help themselves. Thus, peer abuse requires a power imbalance. Peer abuse can be direct, in physical or verbal forms, or indirect, in such forms as exclusion, gossiping, and rumours. Signs of peer on peer abuse include:

- Torn clothing
- Physical injury such as bruises, cuts, scratches without a natural explanation
- Loss of money or damaged property
- Unwillingness to go to college
- Change in eating habits
- Moody outbursts or withdrawn behaviour.

Peer abuse has serious effects. Victims can suffer injury, depression and lowered self-esteem, and many contemplate suicide. Peer abusers are also at risk of alcohol and drug abuse, delinquency, and criminal behaviour.

Peer abuse affects many people, and victims and bystanders are often afraid to report abuse and feel unsafe or unsupported.
**Upskirting**

Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Under the Voyeurism Act, upskirting offenders can now be arrested, face up to two years in prison and have their name placed on the sex offenders register if caught upskirting. This includes instances where culprits say the images were taken in jest, as what may seem like harmless fun can have deeper consequences for both the victim and perpetrator.

**Children with Special Educational Needs and Disabilities (SEND)**

Children and young people with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. TSN acknowledges that additional barriers can exist when recognising abuse and neglect in this group of children and young people.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration
- The potential for children with SEND being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

**Domestic abuse or violence**

Includes an incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is, or has been, an intimate partner or family member, regardless of gender or sexual orientation. This includes psychological/emotional, physical, sexual and financial abuse, so-called ‘honour’-based violence, forced marriage or Female Genital Mutilation (FGM). The government has recently consulted on a proposal to introduce a mandatory reporting duty on forced marriage. If implemented, this will mirror the duty already in place to report known cases of FGM.

**Serious violence**

All members of staff should be aware of the indicators which may signal that an individual is at risk from or involved with serious violent crime. Indicators may include increased absence from school/work, a change in friendships or relationships with older individuals or groups, a significant decline in educational or workplace performance, signs of self-harm, or significant changes in well-being/signs of assault. Unexplained gifts or new possessions could also indicate that an individual has been approached by, or is involved with, criminal networks or gangs.

When an individual begins to show signs of exploitation or vulnerability to exploitation, we should be able to intervene as early as possible to help reduce the risk factors and increase protective factors.

**Modern slavery**

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Discriminatory abuse – Adults at risk**

Including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment; because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual or transgender. This includes racism, sexism, ageism, homophobia or any other form of hate incident or crime.
**Financial or material abuse – Adults at risk**

Including theft, fraud, internet scamming, exploitation, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**Organisational (sometimes referred to as institutional) abuse – Adults at risk**

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in a person’s own home. This may range from one-off incidents to ongoing ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Self-neglect – Adults at risk**

Includes a person neglecting to care for their personal hygiene; health or surroundings; or an inability to provide essential food; clothing; shelter or medical care necessary to maintain their physical and mental health; emotional well-being and general safety. It includes behaviour such as hoarding.

**County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of ‘deal line’.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, Special Educational Needs (SEN) schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.
Mental health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child or vulnerable adult 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 or vulnerable adults 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 or vulnerable adults have suffered abuse and neglect, or other potentially 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/vulnerable adults’ experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child or vulnerable adult that is also a safeguarding concern, immediate action should be taken, following their child protection policy, safeguarding policy and speaking to the Designated Safeguarding Lead (DSL) or a deputy.

The Referral process

The following ‘5R’ process MUST be followed by all TSN staff:

- **Recognise** the signs of abuse.
- **Respond** and react accordingly.
- **Record** the facts of the disclosure.
- **Report** the disclosure to the DSL (or Deputy/Safeguarding Officers) immediately. All SRFs must be forwarded to the DSL within 24 hours.
- **Refer** (to the emergency services or social services or through the Channel process) in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to the DSL (or Deputy/Safeguarding Officers) immediately. All SRFs must be forwarded to the DSL within 24 hours.

a. Recognise

Signs of abuse can be recognised as differences to the individual’s usual behaviour or observed from a change in their physical appearance as mentioned below:

- **Physical** – this could include a lack of personal hygiene, self-harm, substance or drug abuse, noticeable signs of bruising or flinching when being touched, and/or the development of a speech disorder or learning difficulty that cannot be attributed to a physical or psychological cause.

- **Behavioural** – this could include sudden changes in a person’s character, including lack of confidence, low self-esteem, becoming withdrawn, aggressive or angry for no reason, and/or becoming anxious or tearful.

The information above is by no means exhaustive, and an individual may not wish to disclose something that they perceive as ‘normal’.
b. Respond

People are often reluctant to talk about abuse. Many perpetrators may tell people to keep the abuse a secret and frighten them with unpleasant consequences. Listed below are some ways to respond to issues or concerns:

- Stay calm and listen carefully to what is being said
- Reassure the person that they have done the right thing by telling you, but not that everything will be okay; sometimes things get worse before they get better
- Find an appropriate early opportunity to explain that it is likely the information will need to be shared with others, but that this will be on a need-to-know basis
- Allow the person to continue at his/her own pace – asking questions for clarification only; try to use phrases such as ‘Tell me’, ‘Explain to me’, ‘Describe to me’, and avoid leading questions
- Explain what you will do next and with whom the information will be shared
- Do not delay in discussing your concerns with the appropriate staff.

If you feel that anyone is at immediate risk, please take any reasonable steps within your role to protect any person from immediate harm, for example:

- Call an ambulance or a GP if someone needs medical attention
- Call the emergency services/police if a crime is taking place or has taken place
- Inform the DSL immediately
- Separate the alleged perpetrator and victim – but only if it is safe to do so.

Any violence by a learner or member of staff (including employer staff) must be reported through TSN’s Internal Notification Process.

If you are suspicious but no disclosure has taken place:

- Discuss your concerns with the DSL (or Deputy/Safeguarding Officers).

If a person approaches you to make allegations of inappropriate behaviour or misconduct against a member of staff:

- Contact your line manager and DSL (or Deputy/Safeguarding Officers)
- Follow the guidelines in the ‘Managing Allegations Against Staff’ policy
- Do not question the person making the allegation or investigate the matter yourself.

Information sharing

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality.

When sharing information, remember:

- The Data Protection Act (2018) is not a barrier to sharing information
- Be open and honest
- Seek advice
- Share with informed consent where appropriate (there may be some circumstances where seeking consent, including parental consent, is not required)
- Consider safety and well-being
- Ensure that information sharing is appropriate and secure
- Keep a record.
c. Record
A Safeguarding Reporting Form (SRF) MUST be completed.
Where an SRF is not readily available, please ensure that the following information is noted:

- Your details
- Name of those involved
- Date of incident(s)/disclosure/suspicion
- Details of incident(s)/disclosure/suspicion
- Background information
- Actions taken.

Whilst you can record observations, do not interpret or give opinions, as this may bias the information provided and jeopardise any future investigation into the allegation.

The SRF should be kept secure and forwarded to your DSL (or Deputy/Safeguarding Officers).

d. Report
Any issues, concerns, allegations or suspicions relating to safeguarding must be taken seriously and reported to the DSL (or Deputy/Safeguarding Officers).

e. Refer
Where required, the DSL (or Deputy/Safeguarding Officers) will deal with the relevant referrals and liaise with the relevant external agency.

This will include the following:

- Any referrals to social services or through the Channel process.
- Where there is disagreement between members of staff about the need to make a referral.
- Concerns about a young person subject to a Child Protection Order should be relayed to the keyworker immediately, in the absence of a key worker, the procedure below should be followed.
- Where appropriate, we will refer all safeguarding incidents to the relevant College Partner Safeguarding Lead.

Notifying partners
DSL and/or a member of TSN’s Safeguarding Team will notify the DSL/Safeguarding Team of all relevant sub-contracting partners at the point a referral has been closed or at the point in which a referral has been addressed but is being constantly monitored.

Learners aged 18 years or over
There is no requirement to report abuse to any external agency unless there is a risk to others aged under 18 years, or it concerns an adult at risk, in which case TSN’s safeguarding procedures should be followed.

The learner may wish to involve the police. The role of TSN staff is to support them through this process. Alternatively, if this is past abuse, then the learner may require directing towards a counselling agency, such as NSPCC, Victim Support, SupportLine or other abuse survivor support agencies.
Internal Notification Process – Safeguarding

If a safeguarding incident requires a referral to social care or emergency services to be called, the DSL (or Deputy/Safeguarding Officers) must be notified on the day of referral.

Confidentiality

The safety and well-being of the child or adult at risk is paramount. Staff may have access to confidential information about learners in order to undertake their everyday responsibilities. In some circumstances, staff may be provided with highly sensitive or private information. They should never use confidential or personal information about a learner or his/her family for their own or others’ advantage. Information must never be used to intimidate, humiliate, or embarrass a learner.

- The DSL (or Deputy/Safeguarding Officers) will disclose personal information about a learner to other employees on a need-to-know basis only. The DSL (or Deputy/Safeguarding Officers) will make a judgement in each individual case about who needs and has a right to access particular information.

- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children/young people and adults at risk, in consultation with the local DSL (or Deputy/Safeguarding Officers).

- All 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, TSN may seek legal advice prior to releasing any information.

- TSN complies with the requirements of the Data Protection Act 2018. The Data Protection Act 2018 does not prevent staff from sharing information where this is necessary to protect the safety and well-being of the child or adult at risk.

- All staff must be aware that they cannot 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.

Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent, or a close relative, cares for a child for a period of 28 days or more, with the agreement of the child’s parents. It applies to children under the age of 16, or aged under 18 if the child is SEND. Children who are looked after by the local authority, or placed in a residential school, children’s home or hospital, are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture, and children may be privately fostered at any age.

Most privately fostered children remain safe and well; however, it is important that all staff are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children’s Social Care as soon as possible. If TSN becomes aware of a private fostering arrangement for a learner that has not been notified to Children’s Social Care, we will encourage parents and private foster carers to notify Children’s Social Care and will share information, as appropriate.
Managing allegations against staff

All employees should take care not to place themselves in a vulnerable position with a child/young person or adult at risk and be aware of, and adhere to, all aspects of appropriate professional conduct.

All employees are advised to read Guidance for Safer Working Practice 2015. This is available on the Safeguarding Information pages (located on the staff ‘shared area’).

We may occasionally receive complaints or allegations against a member of staff. It is important that a fair and balanced approach is taken to ensure that both the complainant and the staff member are safeguarded.

- If such an allegation is made, the staff member should immediately inform their line manager, who will then immediately discuss the content of the allegation with the DSL (or Deputy/Safeguarding Officers) and the HR Manager.
- It is important that no further action is taken in respect of gathering statements from other staff/learners or interviewing until directed by the DSL (or Deputy/Safeguarding Officers), or HR Manager.
- The management of allegations is outlined in greater detail in the ‘Managing Allegations Against Staff’ procedure (Appendix 2).

Where it is subsequently found that an allegation was made with malice, the HR Manager will determine an appropriate course of action. This may include disciplinary action against the accuser, acceptance of a written apology (subject to agreement about future behaviour) or other such sanctions as are deemed appropriate.

Safer recruitment

TSN will prevent people who pose a risk of harm from working with children, young people and adults at risk by adhering to statutory responsibilities and obligations in line with safe recruitment practices.

We have created a culture of safer recruitment and, as part of that, have adopted recruitment procedures that help deter, reject or identify people who might abuse children, young people and adults at risk. We will act reasonably in making decisions about the suitability of the prospective employee/volunteer based on checks and evidence, including criminal record checks (DBS checks), barred list checks and prohibition checks, together with references and interview information.

The level of DBS required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work for TSN.

For most appointments, an enhanced DBS, which includes barred list information, will be required as the majority of employees will be engaging in regulated activity. A person will be considered to be engaging in regulated activity if as a result of their work they will:

- Be responsible, on a regular basis, for teaching, training, instructing, or supervising children, young people and/or adults at risk; or
- Carry out paid, or unsupervised unpaid, work regularly for TSN where that work provides an opportunity for contact with children, young people and/or adults at risk.
**Equal opportunities statement**

This policy will be implemented in accordance with TSN’s Equality Strategy.

**Further guidance**

Staff can access further information and guidance related to safeguarding (including Prevent) on the ‘shared area’.

**Useful contacts**

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Email</th>
<th>Tel. Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stuart Allen</td>
<td>Designated Safeguarding Lead</td>
<td><a href="mailto:safeguarding@theskillsnetwork.com">safeguarding@theskillsnetwork.com</a></td>
<td>07912270020</td>
</tr>
<tr>
<td>Josh Hill</td>
<td>Deputy Safeguarding Lead</td>
<td><a href="mailto:josh.hill@theskillsnetwork.com">josh.hill@theskillsnetwork.com</a></td>
<td>07860 850691</td>
</tr>
<tr>
<td>Ashleigh Penny</td>
<td>Deputy Safeguarding Lead</td>
<td><a href="mailto:ashleigh.penny@theskillsnetwork.com">ashleigh.penny@theskillsnetwork.com</a></td>
<td>01757606660</td>
</tr>
<tr>
<td>Claire Howard</td>
<td>Deputy Safeguarding Lead</td>
<td><a href="mailto:claire.howard@theskillsnetwork.com">claire.howard@theskillsnetwork.com</a></td>
<td>01757210522</td>
</tr>
<tr>
<td>Rachel Kirk-Wade</td>
<td>Safeguarding Officer</td>
<td><a href="mailto:rachel.kirk-wade@theskillsnetwork.com">rachel.kirk-wade@theskillsnetwork.com</a></td>
<td>01757210522</td>
</tr>
<tr>
<td>Ailsa Moran</td>
<td>Safeguarding Officer</td>
<td><a href="mailto:ailsa.moran@theskillsnetwork.com">ailsa.moran@theskillsnetwork.com</a></td>
<td>01757210522</td>
</tr>
<tr>
<td>Peter McCann</td>
<td>Governor Safeguarding Lead</td>
<td><a href="mailto:peter.mccann@theskillsnetwork.com">peter.mccann@theskillsnetwork.com</a></td>
<td>01757210522</td>
</tr>
</tbody>
</table>
Safeguarding and Prevent Notification Form (Strictly Confidential)

This form is to be used by all staff (and relevant employer staff) to record any Prevent issues and safeguarding incidents, disclosures or suspicions of abuse or potential risk of harm relating to a child (under 18 years), young person or adult at risk.

Once completed and checked, the form should be sent to the Designated Safeguarding Lead (DSL) within 24 hours. The DSL will notify the HR Manager, appropriate member of the SLT, and the Safeguarding Lead for Governors, as appropriate.

Note: This form is to be completed electronically.

Part A – Control and follow-up

<table>
<thead>
<tr>
<th>Incident</th>
<th>Date</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Referral to DSL (or Deputy DSL)</td>
<td></td>
<td>Click or tap to enter a date.</td>
</tr>
<tr>
<td>Referral to Safeguarding Officers</td>
<td></td>
<td>Click or tap to enter a date.</td>
</tr>
<tr>
<td>Referral to HR Manager</td>
<td></td>
<td>Click or tap to enter a date.</td>
</tr>
<tr>
<td>Follow-up: 1 to 4 weeks</td>
<td></td>
<td>Click or tap to enter a date.</td>
</tr>
<tr>
<td>Follow-up: 2 to 3 months</td>
<td></td>
<td>Click or tap to enter a date.</td>
</tr>
<tr>
<td>Follow-up: 3 to 6 months</td>
<td></td>
<td>Click or tap to enter a date.</td>
</tr>
<tr>
<td>Follow-up: (other)</td>
<td></td>
<td>Click or tap to enter a date.</td>
</tr>
</tbody>
</table>
### Part B – Headline details

<table>
<thead>
<tr>
<th>Referral made by TSN staff: (Yes/No)</th>
<th>Name of person making this referral: (please print name)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Job title of referrer:</strong></td>
<td><strong>Contact phone number</strong></td>
</tr>
<tr>
<td><strong>Place of work of referrer:</strong></td>
<td><strong>Email of referrer:</strong></td>
</tr>
<tr>
<td><strong>Is this a safeguarding incident? (Yes/No)</strong></td>
<td><strong>Is this a Prevent incident? (Yes/No)</strong></td>
</tr>
</tbody>
</table>

### The learner’s details

<table>
<thead>
<tr>
<th>Is the learner a:</th>
<th>Name of learner:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Child or young person (under 18 years of age)</td>
<td><strong>Yes/No</strong></td>
</tr>
<tr>
<td>• Adult</td>
<td><strong>Yes/No</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Learner number:</th>
<th>Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of birth: Click or tap to enter a date. Age at point of referral:</td>
<td>Telephone number:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Course/curriculum area</th>
<th>Was interpreter:</th>
<th></th>
<th>First preferred language:</th>
<th>Any specific needs?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Required?</td>
<td></td>
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<tr>
<td></td>
<td>• Arranged?</td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

| | Name and address of employer [for Apprentices]: |
### Part C – Details of safeguarding concern

**Detail the safeguarding concern:**

**Other relevant details about the person involved:**
*Include family circumstances (e.g. substance misuse, domestic abuse, parental mental health issues, or any other factor which may impact on parenting), physical and mental health of the person concerned, any communication or learning difficulties they may have.*

| **Is the person in danger of further abuse?** | Yes/No |
| **Is the person any risk to others?** | Yes/No |

**Parent/guardian/carer contact details:**

**Relationship to person concerned:**

**Any siblings/children/dependants if known:** Yes/No/Not known

<table>
<thead>
<tr>
<th>Name</th>
<th>DOB</th>
<th>Gender</th>
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</thead>
</table>

**Name and address of GP (If known):**

**Are you recording:**
- A disclosure made directly to you by the learner? □
- A disclosure or suspicions from a third party? □
- Your own suspicions or concerns? □

**Date and time of disclosure:** Click or tap to enter a date.

**Date and time of incident:** Click or tap to enter a date.

**Are there any previous reports?** Yes/No
<table>
<thead>
<tr>
<th>Date(s) of any previous reports (if applicable)</th>
<th>Click or tap to enter a date.</th>
</tr>
</thead>
</table>

**Is there a risk assessment in place for any learners involved in the disclosure?**  Yes/No

**Name of learner (if different to report name):**  

**Date of risk assessment:**  

<table>
<thead>
<tr>
<th>Additional risk factors</th>
<th>Radicalisation</th>
<th>Pregnant</th>
<th>Has responsibility for children</th>
<th>Current or recent suicide attempts</th>
<th>History of self-harming</th>
<th>Self-neglect</th>
<th>Threats of violence to others</th>
<th>Substance misuse</th>
<th>Currently receiving medication</th>
<th>Mental health problems</th>
<th>Other [please state]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Radicalisation</td>
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<tr>
<td>Pregnant</td>
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<td>Has responsibility for children</td>
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<td>Current or recent suicide attempts</td>
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<tr>
<td>History of self-harming</td>
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<tr>
<td>Self-neglect</td>
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<tr>
<td>Threats of violence to others</td>
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<tr>
<td>Substance misuse</td>
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<tr>
<td>Currently receiving medication</td>
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<tr>
<td>Mental health problems</td>
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<tr>
<td>Other [please state]</td>
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</tbody>
</table>
### Part D – Action – Response

<table>
<thead>
<tr>
<th>Internal action</th>
<th>Referred to DSL (Deputy/Safeguarding Officers) and/or HR</th>
<th>Notes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>External agencies</td>
<td>Referral to social services</td>
<td>Notes:</td>
</tr>
<tr>
<td>External agencies</td>
<td>Police or other emergency services involved?</td>
<td>Notes:</td>
</tr>
<tr>
<td>External agencies</td>
<td>Were any other external agencies contacted?</td>
<td>Notes:</td>
</tr>
<tr>
<td>Medical</td>
<td>Was A&amp;E attended?</td>
<td>Notes:</td>
</tr>
<tr>
<td>Medical</td>
<td>Which agency/service was contacted?</td>
<td>Notes:</td>
</tr>
<tr>
<td>Medical</td>
<td>Was first aid administered?</td>
<td>Notes:</td>
</tr>
<tr>
<td>Medical</td>
<td>Details of first aid administered:</td>
<td>Notes:</td>
</tr>
<tr>
<td>Data and consent</td>
<td>Has the person concerned been informed and consents to the sharing of this information with other professionals/organisations?</td>
<td>Notes:</td>
</tr>
<tr>
<td>Data and consent</td>
<td>Information shared with:</td>
<td>Notes:</td>
</tr>
<tr>
<td></td>
<td>(Please include contact details)</td>
<td></td>
</tr>
<tr>
<td>Location</td>
<td>The person concerned is now:</td>
<td>Notes:</td>
</tr>
<tr>
<td></td>
<td>(Describe current condition and whereabouts)</td>
<td></td>
</tr>
<tr>
<td>Additional notes:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Part E – Ethnicity and diversity monitoring

<table>
<thead>
<tr>
<th>Identity Category</th>
<th>Please Tick</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>White</strong> Welsh / English / Scottish / Northern Irish / British</td>
<td>☐</td>
</tr>
<tr>
<td><strong>White</strong> Irish</td>
<td>☐</td>
</tr>
<tr>
<td><strong>White</strong> Gypsy or Irish Traveller</td>
<td>☐</td>
</tr>
<tr>
<td><strong>White</strong> Any other White background, please describe</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Mixed / Multiple ethnic groups</strong> White and Black Caribbean</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Mixed / Multiple ethnic groups</strong> White and Black African</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Mixed / Multiple ethnic groups</strong> White and Asian</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Mixed / Multiple ethnic groups</strong> Any other Mixed / Multiple ethnic background, please describe</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Asian / Asian British</strong> Indian</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Asian / Asian British</strong> Pakistani</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Asian / Asian British</strong> Bangladesh</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Asian / Asian British</strong> Chinese</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Any other Asian background, please describe</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Black / African / Caribbean / Black British</strong> – African</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Black / African / Caribbean / Black British</strong> – Caribbean</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Black / African / Caribbean / Black British</strong> – Any other Black / African / Caribbean background, please describe</td>
<td>☐</td>
</tr>
<tr>
<td><strong>Arab</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Other ethnic group</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Male</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Female</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Transgender</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>16-18</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Adult (vulnerable)</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Bisexual</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Gay</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Heterosexual</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Prefer not to say</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Not known – not revealed</strong></td>
<td>☐</td>
</tr>
<tr>
<td><strong>Other</strong></td>
<td>☐</td>
</tr>
</tbody>
</table>
The TSN Safeguarding and Prevent Policy is promoted to stakeholders in the following ways:

**Apprentices**
- Introduced during on-boarding process and induction, and paper handout given for reference
- All Apprentices must complete an additional CPD certified module in Safeguarding, e-Safety and Prevent to develop understanding
- Embedded in resources where possible
- Embedded in regular sector-specific e-news updates
- Highlighted in quarterly newsletters
- Reinforced in Teaching, Learning and Assessment (TLA) at every Trainer visit.

**Employers**
- Regular email circulation of the safeguarding referral process and safeguarding webpage, which includes:
  - TSN Safeguarding and Prevent Policy
  - Safeguarding Referral Form (SRF)
  - Detailing of different categories of abuse.
- In-depth check and discussion of the following employer policies during on-boarding and employer engagement processes: Health and Safety Policies, Employer Behaviour Codes, and Health and Safety Risk Assessments
- Insurances and reassurances are in place at all Apprenticeship workplaces
- Highlighted in quarterly newsletters
- ‘Employer Guidance’ handbook for safeguarding, including their responsibilities, TSN’s responsibilities, and the referral process in detail.

**Partners**
- Regular email circulation of the safeguarding referral process and safeguarding webpage, which includes:
  - TSN Safeguarding and Prevent Policy
  - Safeguarding Referral Form (SRF)
  - Detailing of different categories of abuse.
- Updates to Safeguarding and Prevent Policy included and discussed in due diligence (minimum annually)
- Highlighted in quarterly newsletters
- Monthly face-to-face meetings with Partnerships Director, with fixed agenda items for:
  - Reviewing Counter-Terrorism Local Profile (CTLP) and Local Authority ‘Channel’ Coordinator
  - Reviewing any Prevent risks identified.

Feedback on TSN Safeguarding and Prevent Policy and referral procedures is collected during monthly face-to-face meetings with our Partnerships Director, before being collated and brought to monthly Senior Management Team (SMT) meetings for discussion.
Staff

- Mandatory completion of safeguarding, Prevent and e-Safety training, with annual refresher training
- Line managers, Trainers and key delivery staff complete regular workshop-based training to contextualise referral process and different types of abuse
- All members of staff complete training on how to recognise signs of abuse and make a referral
- Regular internal email reminders of safeguarding referral procedure and contact details for the Safeguarding Team
- 100% of staff read ‘Keeping Children Safe in Education 2020 – Part One’ sign to confirm that they have understood this, and this understanding is checked by line manager
- Separate, additional face-to-face training for members of Apprenticeships Team, Senior Management Team (SMT) and Governors
- The following points are fixed agenda items for all team and one-to-one meeting agendas to be embedded across all departments:
  - Safeguarding
  - Prevent
  - e-Safety
  - Equality and Diversity
  - Health and Safety.

Impact of TSN Safeguarding and Prevent Policy is assessed in:

- Monthly Safeguarding, Prevent and Inclusion Steering Group meeting – with all members of Operational Management
- Quarterly Strategic Safeguarding, Prevent and Inclusion Committee – with all members of Senior Management Team (SMT) and independent Chairman
- TSN Annual Safeguarding Review Report; witch forms part of annual overall Self-Assessment Report (SAR).
Managing Allegations Against Staff

Contents
Introduction
Context
Dealing with allegations
1. Referral
2. Initial considerations
3. Action following initial considerations
4. Suspension
5. Case subject to criminal investigation
6. Referral to DBS
7. Malicious or unsubstantiated allegations.

Introduction
The Skills Network (TSN) believes that all members of the organisation, as well as our learners, are entitled to receive care and protection from harm. We will ensure that any concerns or allegations of impropriety are dealt with appropriately, fairly and sensitively.

Everyone within TSN has a responsibility for safeguarding and promoting the welfare of children and young people, and for ensuring their safety and well-being.

We have a robust recruitment and selection procedure to ensure that all staff have been appropriately screened prior to appointment, in accordance with the organisation’s safeguarding procedures.

Mandatory child protection and safeguarding training is undertaken by all staff through induction programmes and staff undertake regular and continuous professional development, in line with statutory requirements.

All staff have a duty to ensure that young people and learners are safe and protected. All staff must ensure that safeguarding procedures are appropriately followed if there are any concerns relating to the welfare or safety of a young person or learner.

In any conflict between the needs of a young person/learner and those of others, the needs of the young person/learner must come first. Staff must report any allegation which may indicate that a staff member has behaved in a way that has:

- Harmed or may have harmed a young person/learner
- Possibly committed a criminal offence against a young person/learner
- Behaved in a way which indicates that she/he is unsuitable to work with young people/learners.
These procedures should also be applied where there is evidence of any of the following:

- **Abuse of trust** – for example, a person over 18 involving a young person under that age in sexual activity, when she/he is in a specified position of trust in relation to the young person

- **Grooming** – for example, developing a relationship with a young person with a view to sexually abusing them

- **Communication of a sexual nature to young people** – for example, indecent or suggestive text messages, text images or emails

- **Offences suggesting that a person may be a risk to young people/vulnerable adults** – for example, accessing, making or distributing indecent images of children, serious assault on an adult, serious drug offences, and perpetrating domestic violence.

*Note:*

These procedures are also distinct from complaints of poor practice and disciplinary issues where there are no child protection or safeguarding issues.

The fact that a member of staff tenders their resignation, or ceases to provide services, must not prevent an allegation being investigated under these procedures.

**Context**

Allegations may be made in various ways:

- Direct disclosure by young people/learners/vulnerable adults
- Indirect disclosure, i.e. through written work or art
- Complaints to TSN from parents/carers
- Complaints to social care by parents/carers/young people
- Complaints to police by parents/carers
- Reports by other colleagues or agencies.

The context in which an incident occurs is crucial to understanding the incident and the definition attached to it. Allegations need to be considered with reference to the following:

- The seriousness of the allegation
- Date(s) when the alleged incidents occurred
- The degree and extent of harm
- The frequency of alleged abuse
- The circumstances in which it allegedly took place
- The age of the young person
- The environment and setting
- Expectations and standards applied to the member of staff/volunteer.

There are up to three strands in the consideration of an allegation:

- A police investigation into a possible criminal offence
- Enquiries and assessment by social care about whether a child is in need of protection
- Consideration by TSN of possible disciplinary action.
Dealing with allegations

1. Referral

All allegations should be communicated immediately to the Designated Safeguarding Lead (DSL) and the HR Manager. In the event of a Safeguarding Reporting Form (SRF) being required, the staff member should then consult with the DSL, or HR Manager, and submit the form accordingly. It is important that the staff member (or their Line Manager) does not conduct any investigations or take statements at this stage and awaits advice from the DSL or HR Manager.

The seriousness of some incidents will require an immediate referral to social care, while others of a less serious nature will not warrant consideration by social care; however, it is important to ensure that all allegations are dealt with appropriately.

2. Initial considerations

The DSL will advise and consult with the Local Authority Designated Officer (LADO) and the HR Manager.

The following outcomes may result from investigation:

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate attempt to deceive
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

3. Action following initial considerations

Where initial consideration decides that the allegation does require a referral to police or social services, the referral will be followed by a strategy meeting to consider the information available and to make decisions about what action should be taken, both to safeguard the young person (and others), and to determine the appropriate course of action.

Where it is decided that the allegation does not warrant a possible criminal offence, then TSN will consider dealing with the issue under its disciplinary procedures, as appropriate.

4. Suspension

Suspension of the staff member(s) should not be automatic, or the default option. The possible risk of harm to young people posed by an accused person needs to be carefully evaluated and managed. Suspension will be considered where there is cause to suspect the following:

- A young person is or young people are, or may be at risk of, significant harm
- The individual may impede any police or social care investigation
- The nature of the allegation is such that there are grounds for dismissal
- There is ‘reasonable and just cause’ to suspend.
5. Case subject to criminal investigation

If following the police investigation there is a decision to administer a caution or not to charge a person, the police should pass the information to TSN without delay, to enable possible disciplinary proceedings to begin.

Should a person be convicted, the police will notify TSN, so that appropriate action can be taken.

6. Referral to DBS

If, upon conclusion of the case, TSN dismisses the person, or the person ceases to provide his/her services, TSN has a legal requirement to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child or adult at risk, or if a person otherwise poses a risk of harm to a child or adult at risk.

7. Malicious and unsubstantiated allegations

- Malicious allegations must be removed from personnel records. Allegations found to have been malicious, unsubstantiated and unfounded should not be referred to in employer references.

- Any young people/learners/staff found to have made demonstrably false allegations should be subject to disciplinary action.
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Introduction

Information Technology (IT) is now an essential resource to support learning and teaching, as well as playing an important role in the everyday lives of children, young people and adults.

Information and Communications Technology (ICT) covers a wide range of resources, including web-based and distance learning. It is also important to recognise the ever-changing evolution of technology within our society. Currently, the technologies that children and young people are using, both inside and outside of the learning environment include:

- Websites
- Learning platforms and Virtual Learning Environments (VLE)
- Email and instant messaging
- Chat rooms
- Social networking websites
- Blogs and Wikis
- Podcasting
- Video broadcasting
- Music downloading
- Gaming
- Mobile/smartphones with text, video and/or web functionality
- Other mobile devices with web functionality.

Whilst exciting and beneficial both in and out of the context of education, a lot of Information Technology (IT), particularly web-based resources, is not consistently policed. All users need to be aware of the range of risks that are associated with the use of these technologies.

All TSN staff understand the responsibility to educate our learners on e-safety issues to enable them to remain both safe and legal when using the internet.

This guidance relates to both fixed and mobile technologies, such as PCs, laptops, tablets, webcams, whiteboards and digital video equipment etc.

This policy applies to all staff, learners and visitors to all TSN premises.

Roles and responsibilities

E-safety is an important aspect of strategic leadership, and all staff have a responsibility to ensure that the policy and practices are embedded and monitored effectively by all staff. This includes being aware of current issues and guidance through organisations such as the Home Office, Child Exploitation and Online Protection (CEOP) and Childnet.

The IT and Safeguarding Teams will also provide support and guidance to staff, in order to ensure understanding, awareness and compliance.

E-safety skills development for staff

- New staff will receive information on TSN’s IT-related policies as part of their induction
- All staff will be made aware of their individual responsibilities relating to the safeguarding of children within the context of e-safety and know what to do in the event of the misuse of technology by any learner or member of the staff
- All staff are encouraged to incorporate e-safety activities and awareness across all areas of their practice
- All staff will sign the Code of Conduct relating to e-technologies during induction.
Managing e-safety messages

- We endeavour to embed e-safety messages across the curriculum, whenever the internet and/or related technologies are used
- All learners will be required to sign a Code of Conduct relating to e-technologies as part of their induction and their Learner Agreement.

E-safety in the curriculum

- All learners will receive specific training relating to safe working practices regarding the use of e-technologies
- TSN will provide ongoing opportunities within a range of curriculum areas to teach about e-safety
- Educating learners on the dangers of technologies that may be encountered outside in everyday life is done informally when opportunities arise, and as part of the e-safety curriculum
- Learners are aware of the impact of online bullying and know how to seek help if they are affected by these issues. They are also aware of where to seek advice or help if they experience problems when using the internet and related technologies; i.e. parent/carer, Tutor/trusted staff member, or an organisation such as Childline/CEOP report abuse button
- Learners are aware of the dangers of radicalisation and extremist behaviours they may encounter via the internet and who to report any concerns to.

Password security

- All users read and sign a Code of Conduct/Acceptable Use Agreement to demonstrate that they have understood TSN’s Information Technology policies.
- If you think your password may have been compromised or someone else has become aware of your password, report this to a staff member.
- Staff are to be aware of their individual responsibilities to protect the security and confidentiality of TSN’s networks, including ensuring that passwords are not shared and are changed periodically. Individual staff users must also make sure that workstations are not left unattended and are locked when not in use.
- Staff must ensure that any accounts set up on social media platforms should be kept secure and confidential, and that staff profiles are not left logged in.

Data security

The accessing, and potential breaching, of the organisation’s databases is a serious offence. Therefore, it is vitally important that all staff are fully aware of their responsibility when accessing the organisation’s data.

They must not:

- Allow third parties’ staff to view the organisation’s data (unless authorised by a senior manager)
- Edit any data (unless specifically authorised to do so by senior managers).
Safer use of the Internet

The internet is an open communication medium that is available to everyone. Anyone can view information, send messages, discuss ideas and publish material, which makes it an invaluable resource for education, business and social interaction, as well as a potential risk to young and vulnerable people.

All internet use is recorded appropriately, and the logs are randomly, but regularly, monitored in line with TSN’s IT Acceptable Use policy. Monitoring of identified key words and websites connected to terrorist activity is in place and search reports are generated and inappropriate use monitored and scrutinised. However, to ensure that learners are protected against unnecessary risks, all staff must:

- Supervise learners’ access to internet resources.
- Preview any recommended sites before use.
- Discourage raw image searches when working with young people.
- Observe copyright laws at all times. It is illegal to copy or distribute software or illegal software and other materials.
- Ensure that learners are not accessing inappropriate material.

Infrastructure and monitoring

To aid effective safeguarding of learners whilst using TSN internet services, the company employs the following technologies and processes:

- Internet and email monitoring solution activity is monitored and recorded in line with TSN policies and under the relevant UK law
- Internet access is controlled through an appropriate web filtering service
- Staff and learners are made aware that email and internet activity can be monitored and explored further if required
- TSN uses management control tools for controlling and monitoring workstations
- If staff or learners discover an unsuitable site, the incident should be reported immediately to the IT department, or a member of staff
- Learners and staff are not permitted to download programs or files on centre-based IT facilities
- If there are any issues that are related to viruses or anti-virus software, then the IT Team should be informed immediately.
Social networking

Social networking sites, if used responsibly both outside and within an educational context, can provide easy-to-use, creative and free facilities. However, it is important to recognise that there are issues regarding the appropriateness of some content, contact, culture and commercialism. To this end, we encourage our learners to think carefully about the way that information can be added and removed by all users, including themselves, from these sites.

- Access to social public networking sites for purposes of learning, engagement and communication is under continual development within the organisation
- Any young people engaging in such activities are required to have received specific training in social media usage and safety
- Learners must also sign and adhere to the Code of Conduct during induction
- Learners are advised to be cautious about the information given by others on sites
- Learners are taught to avoid placing images of themselves (or details within images that could give background details) on such sites and to consider the appropriateness of any images they post, due to the difficulty of removing an image once online
- Learners are always reminded to avoid giving out personal details on such sites which may identify them or their location (full name, address, mobile/home phone numbers, email address)
- Learners are advised that if they have profiles on social networking sites that they set and maintain these on maximum privacy and deny access to unknown individuals
- Learners are encouraged to be wary about publishing specific and detailed private thoughts online
- Learners are required to report any incidents of bullying, cyber bullying or sexting to members of staff, who will consider action under anti-bullying and safeguarding procedures.

Maintaining professional boundaries

TSN encourages the positive use of social media. Learners may wish to form effective working relationships with staff; however, to ensure professional boundaries are maintained, staff must not accept and/or invite individuals to be friends on personal social media accounts, or other online services.

Any breach of professional conduct may lead to disciplinary action and possibly lead to dismissal. There may be times where a staff member may know a learner on a personal level (in whatever capacity) prior to them commencing on any programme with TSN. Staff should advise their line manager, if this is the case, and an individual assessment of the situation will take place.

Using organisation logos and images

Do not use the organisation’s logos or any other images or iconography on personal or social media sites, unless explicit permission has been sought from the relevant staff.

Mobile technologies

Emerging technologies will be examined for educational benefit and risk-assessed before use by learners is allowed. TSN chooses to manage the use of these devices in the following ways so that users exploit them appropriately.
**Personal mobile devices (including phones)**

- Educating learners on the dangers of technologies that may be encountered outside in everyday life is done informally when opportunities arise, and as part of the e-safety curriculum.
- We allow staff to bring in personal mobile phones and devices only for their own use. Under no circumstances do we allow a member of staff to contact a learner or parent/carer using their personal device without managerial approval.
- Learners are allowed to bring personal mobile devices/phones to TSN premises (or workplaces, for Apprentices), but they must not be used during learning hours.
- TSN is not responsible for the loss, damage or theft of any personal mobile device.
- The sending of inappropriate text messages between any person within the organisation may invoke disciplinary procedures in line with TSN’s guidelines on the use of IT.
- Permission must be sought before any image or sound recordings are made by devices of any learner or member of staff.

**Email**

The use of email is an essential means of communication for both staff and learners. In the context of using staff emails, this should not be considered private.

The organisation provides all staff with their own email account to use for company business, and this must be used in line with the IT Acceptable Use Policy.

Staff should never disclose their email password to learners under any circumstances.

**Safe use of images**

**Taking of images and film**

Digital images are easy to capture, reproduce and publish and, therefore, can be subject to misuse. It is not always appropriate to take or store images of any individual, without first seeking consent.

- With the written consent of parents (on behalf of young people) and staff, TSN permits the appropriate taking of images by staff and learners with company equipment
- Should any such images be intended for media or publicity purposes, the relevant approval must be sought
- Staff and learners are not permitted to use personal digital equipment, such as mobile phones and cameras, to record images of learners without the appropriate permission.

**Publishing learners' images and work**

All parents/carers (where appropriate) will be asked to give their consent to use their child’s work/photos in the following ways:

- On TSN’s internal and external websites
- In printed publications that TSN may produce for promotional purposes
- To be recorded/transmitted on a video or webcam
- On display material that may be used in external areas, i.e. promotional and advertising material
- For general media appearances, including local/national press releases sent to the press highlighting an activity (sent using traditional methods, or electronically).
Before posting learners' work on the internet, permission and agreement should be sought. Parents or carers may withdraw their permission, in writing, at any time. Learners’ full names will not be published alongside their image and vice versa. Email and postal addresses of learners will not be published, but a town or locality may be indicated.

**Storage of images**
Images will be held securely by TSN, for the sole use of legitimate purposes, normally within a four-year period of its production.

**Webcams**
Webcams within centres are only ever used for specific learning purposes. Misuse of the webcam by any person will result in the appropriate sanctions.

**Misuse and Infringements**

**Complaints**
Complaints relating to e-safety should be made to the IT Department and the DSL so that incidents can be recorded and actioned appropriately.

Under no circumstances is a user of the organisation’s systems and services authorised to engage in any activity that is illegal under local, UK or international law while utilising the organisation’s owned resources.

**Inappropriate material**

- All users are aware of the procedures for reporting accidental access to inappropriate materials. The breach must be immediately reported to a staff member, and the IT department.

- Deliberate access to inappropriate materials by any user will lead to the incident being formally recorded. Depending on the seriousness of the offence, this could warrant an investigation, a local authority referral, immediate suspension (possibly leading to dismissal) and involvement of the police.

- Users are made aware of sanctions relating to the misuse of learning technology. Any misuse of technology in relation to violent extremism will be dealt with in line with our Prevent procedures.
Introduction

TSN has a duty to promote a safe and secure environment in which all learners are free from threats, bullying and associated behaviours and actions.

Bullying is deemed as ‘behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms, including cyber bullying via text messages or the internet, and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a young person is adopted or has caring responsibilities.

It might be motivated by actual or perceived differences between young people (Preventing and Tackling Bullying DfE 2014).

Stopping violence and ensuring learners’ physical safety is the priority for all staff if they encounter any instances of physical bullying. However, emotional bullying can be more damaging than physical bullying, and it is the responsibility of all staff to prevent occurrences of bullying. It is important that all learners feel confident that any incidents will be dealt with promptly and effectively.

These procedures apply to all learners enrolled on TSN learning programmes. The organisation is not directly responsible for bullying or harassment that takes place outside the learning environment and off our premises, but it will take appropriate action if activities have an impact on a learner’s safety and well-being.

Legal framework

Education and Inspections Act 2006

Section 89 of the Education and Inspections Act provides that TSN must have measures in place to encourage good behaviour and prevent all forms of bullying. These measures should be part of TSN’s Behaviour Policy, which must be communicated to young people, learners, parents and colleagues.

The Equality Act 2010

The Equality Act replaces previous anti-discrimination laws with a single Act. A key provision is an Equality Duty which has three aims:

- Eliminate unlawful discrimination, victimisation or any other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic and people who do not.
The Act also makes it unlawful to discriminate against, harass or victimise a young person or learner in relation to admissions or the way it provides education, the provision of access to any benefit, provision or service or subjecting them to any other detriment.

**Safeguarding**

Under the Children Act 1989, a bullying incident should be addressed as a child protection concern when there is ‘reasonable cause to suspect that a young person is suffering, or is likely to suffer, significant harm’. Where this is the case, staff should follow the organisation’s referral process, in line with TSN’s safeguarding procedures.

Similarly, the same procedures will apply to any adults deemed at risk.

Even where safeguarding is not considered to be an issue, staff may need to draw on a range of external services to support a learner who is experiencing bullying, or to tackle any underlying issue which has contributed to a learner engaging in bullying.

**Criminal law**

Although bullying in itself is not a specific criminal offence, it is important to bear in mind that some types of harassment, threatening behaviour or communications, could be a criminal offence for example, Protection from Harassment Act 1997, Malicious Communications Act 1988, the Communications Act 2003 and the Public Order Act 1986.

If staff feel that an offence may have been committed, they should consider contacting the police. For example, under the Malicious Communications Act 1988, it is an offence for a person to send an electronic communication or text with the intent to cause distress or anxiety; or to send an electronic communication which conveys a message which is indecent or grossly offensive, a threat, or information which is false and known to be false by the sender.

**Definitions of types of abuse/harassment**

This is not an exhaustive list.

**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.

**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.

**Emotional abuse**

- Ignoring, excluding, tormenting, insensitive jokes or pranks, damaging property belonging to another person, demanding money or property.
Silent bullying
- Ignoring someone/leaving them out, preventing someone from joining in, the spreading of rumours, threatening gestures and following someone around.

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.

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

Sexual bullying
- Unwanted physical contact or sexually abusive comments.

Homophobic bullying
- Bullying usually aimed at gay, lesbian or bisexual individuals or those with gay, lesbian or bisexual relatives/friends
- The use of generic insults relating to homophobic terms
- Continued unwanted attention through personal contact (directly with you through your friends and family) telephone calls letters, emails, text messages or internet chat rooms.

Hate crime
- Hate crime is any offence against a person or property, which is motivated by the offender’s hatred of people because they are seen as being different
- People do not have to be a member of a minority community to be a victim of hate crime
- Any incident where an individual or group of people are targeted because they are believed to be of a different race, religion/belief, sexual orientation, gender identity or have a disability can be reported as a hate crime.

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’.

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.
**Prevention**

Responding to bullying should not start at the point at which a young person has been bullied. Staff should be proactive about gathering intelligence about issues which may provoke conflict and try to prevent bullying happening in the first place. A variety of strategies should be considered, some of which are listed below.

a) Staff and managerial strategies:

- Ensuring that young people/learners are supervised at appropriate times, especially during break and lunch periods
- Ensuring that all colleagues adhere to Safeguarding/Behaviour Policies and Procedures
- Developing proactive approaches to safeguard learners being bullied, or those deemed as at risk of bullying
- Being alert to early signs of distress
- Listening and acting upon what young people are saying
- Making it easy for young people/learners to report bullying incidents
- Ensuring that appreciation and respect for culture, religion and sexuality are promoted
- Improving self-esteem
- Helping young people/learners to develop strategies in the management of their own behaviour to encourage positive attitudes towards others
- Encouraging young people/learners to reflect on their own attitudes in dealing with bullying
- Regularly evaluating and updating approaches to anti-bullying
- Providing regular staff training
- Celebrating success and diversity.

b) Young people/learner strategies:

- Empowering young people/learners to take positive action against bullying behaviour
- Devising systems to minimise the risks involved in young people informing staff about instances of bullying
- Making confidential sources of advice and support widely available – for example, Childline
- Providing specific sessions covering e-technology, including appropriate behaviour, online safety and conduct
- Involving young people/learners in developing local behaviour policies.

**Procedures and consequences**

The emphasis should be a zero-tolerance attitude to bullying and harassment. It is imperative that a whole-organisational approach is taken to ensure that consistency is maintained.

- All learners should have confidence in TSN’s procedures to report all bullying incidents
- All complaints of bullying and harassment should be investigated thoroughly
- Staff should confront and take appropriate action relating to any bullying they observe, or are informed of
- All incidents should be fully recorded and communicated with the DSL
- Parents/carers should be informed, where appropriate
- Cases of persistent and serious bullying can lead to exclusion.
1. Introduction

Section 26(1) of the Counter-Terrorism and Security Act 2015 (‘the Act’) imposes a duty on ‘specified authorities’, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. Further Education providers are ‘specified authorities’.

It is a condition of funding that all Further Education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

“The aim of the Prevent duty is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Terrorist groups often draw on extremist ideology, developed by extremist organisations. The government has defined extremism in the Prevent strategy as: ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces’.”

2. Safeguarding and the Prevent duty

The document ‘Keeping Children Safe in Education 2020’ identifies radicalisation as one of 16 additional safeguarding concerns. It is important that as part of safeguarding, all learners are protected from radicalisation.

TSN recognises that all staff and learners have a role to play in preventing radicalisation. All complaints, allegations or suspicions relating to radicalisation must be taken seriously and communicated with the DSL.

3. Definition of radicalisation

Radicalisation is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party, who have their own agenda.

Concerns related to radicalisation

Where there are concerns that a student is being radicalised or where there are concerns that a student is expressing extremist views, then, in line with the government Prevent duty guidance, these concerns must be raised in the same way that any other safeguarding concern would be raised.
4. People responsible for safeguarding and Prevent

TSN recognises that safeguarding is everyone’s responsibility. However, there are specific staff with responsibility for safeguarding within the organisation and they are referred to in this document as Designated Safeguarding Lead, Deputy Safeguarding Lead, Safeguarding Officers, HR Manager. A list of names, titles and contact details for these staff, can be found in TSN’s Safeguarding Policy.

5. Reporting concerns

Staff who have a concern should discuss their concerns with an appropriate manager, and then communicate the incident with the DSL, or relevant safeguarding staff, (using TSN’s Safeguarding Reporting Form).

The DSL will then take the appropriate course of action. If the DSL considers that the learner may be at risk of radicalisation, they will make a referral in line with the Prevent duty guidelines.

Note:
At no point should TSN staff undertake any investigatory interviews.

If none of the above are available, contact the HR Manager or the police for further guidance.

If a student is in immediate danger or at risk of serious harm, for example in a life-threatening situation, call the emergency services by dialling 999. You must then communicate the information to the DSL.

Responding to allegations out of office hours

If a concern or an allegation requiring immediate attention is received outside normal office hours the member of staff with the concern must consult immediately with the local Prevent Team.

See The Skills Network’s referral to Channel process.

6. Allegations about a member of staff

The following procedures must be applied where allegations relating to the radicalisation of an employee are received.

There are a number of sources from which a concern or an allegation might arise, including from:

- A learner
- A parent
- A member of the public
- A disciplinary investigation
- Another staff member.

The person to whom an allegation or concern is reported must not question or investigate the matter further; they must:

- Treat the matter seriously
- Avoid asking leading questions, and keep an open mind
- Discuss their concerns with an appropriate manager, and then communicate the incident with the DSL, or relevant safeguarding staff, (using TSN’s Safeguarding Reporting Form).
If the DSL, (or relevant safeguarding staff), are not available, contact the HR Manager or the police for further guidance.

If a staff member is in immediate danger or at risk of serious harm, for example in a life-threatening situation, call the emergency services by dialling 999. You must then communicate the information to the DSL.

**Responding to allegations out of office hours**

If a concern or an allegation requiring immediate attention is received outside normal office hours, the member of staff with the concern must consult immediately with the local Prevent Team.

**Malicious allegations**

Where it is subsequently found that an allegation was made with malice and forethought, the HR Manager will determine an appropriate course of action. This may include disciplinary action against the accuser, acceptance of a written apology (subject to agreement about future behaviour) or other such sanctions as are deemed appropriate.

A flowchart describing TSN’s referral process can be found on the next page.

**Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at: Channel guidance.
Prevent Referral Flowchart

If you believe that someone is vulnerable to being exploited or radicalised, please use TSN’s standard referral procedures to escalate concerns to the appropriate person, who will take the appropriate action.

Record the information on the standard Safeguarding Reporting Form (SRF) and report to your DSL (or relevant safeguarding staff) immediately.

The DSL, and relevant staff, will make a decision regarding referral to Channel.

Referral to Channel via the police or Local Authority Prevent Coordinator.

Immediate Risk
DSL (or relevant safeguarding staff) to immediately contact the police (local counter-terrorism unit).

Risk recognised
Staff to liaise with DSL (or relevant safeguarding staff) to seek appropriate advice and guidance.

Checking process
The DSL (or nominated person) will refer to Channel and report to SMT through the internal notification process.

Referrer decision
The DSL will be informed by Channel as to whether the case will be pursued through Prevent.

ANYONE can make a referral to Channel.

Channel is an early intervention process which will gather information as to determine whether there is a specific risk of radicalisation and whether the threat is malicious.

The local authority Prevent coordinator and the police Channel coordinator will identify the type of support required and refer to a Multi-Agency Channel Panel.

A Multi-Agency Channel Panel is made up of external agencies who will arrange for tailored support, which is approved through the Channel intervention.

The Department for Education has launched a helpline for anyone concerned about a child who may be at risk of extremism, or about extremism within an organisation working with children and young people.

Email: counter.extremism@education.gsi.gov.uk. Telephone: 020 7340 7264.
The Regional HE/FE
Prevent Coordinator Network

https://www.safecampuscommunities.ac.uk/prevent/regional-coordinators
### Risk scoring

<table>
<thead>
<tr>
<th>Likelihood</th>
<th>Severity</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Almost certain</td>
<td>Catastrophic</td>
<td>5</td>
</tr>
<tr>
<td>Very likely</td>
<td>Major</td>
<td>4</td>
</tr>
<tr>
<td>Likely</td>
<td>Moderate</td>
<td>3</td>
</tr>
<tr>
<td>Unlikely</td>
<td>Minor</td>
<td>2</td>
</tr>
<tr>
<td>Improbable</td>
<td>None or trivial</td>
<td>1</td>
</tr>
<tr>
<td>Risk title</td>
<td>Summary</td>
<td>Gross score</td>
</tr>
<tr>
<td>------------</td>
<td>---------</td>
<td>-------------</td>
</tr>
<tr>
<td>1. Online safety</td>
<td>a. Extremist organisations are able to radicalise students online and encourage them to commit acts of violence or incite others to commit acts of violence as ‘lone actors’. b. Learners (and staff) are able to access unlawful radicalising material which promotes proscribed terrorist groups.</td>
<td>12</td>
</tr>
<tr>
<td>Risk title</td>
<td>Summary</td>
<td>Gross score</td>
</tr>
<tr>
<td>------------</td>
<td>---------</td>
<td>-------------</td>
</tr>
</tbody>
</table>
| 2. Work-based learners (including Apprentices) | a. The organisation does not have robust processes in place to protect Apprentices from the risks of radicalisation or views and practices contrary to British Values. | 16 | • Prevent and safeguarding checks form part of the routine assessment by Assessors when they meet with learners.  
• Statement of safeguarding and Prevent principles provided to all employers, outlining responsibilities and reporting processes.  
• Links to e-learning resources provided.  
• Prevent updates are sent as part of regular communications with employers and learners, to heighten their awareness through routine communications. | 8 | | SH / CH / JH / KP | Aug 20 | GREEN |
<table>
<thead>
<tr>
<th>Risk title</th>
<th>Summary</th>
<th>Gross score</th>
<th>Existing controls</th>
<th>Residual score</th>
<th>Further action needed</th>
<th>Who</th>
<th>When</th>
<th>RAG rating</th>
</tr>
</thead>
</table>
| 3. Speakers and events | a. Extremist organisations are given a platform through which to radicalise young people because the organisation has ineffective processes in place for vetting speakers and events. | 8 | • TSN guidance for approving external speakers’ and organisations’ procedures in place.  
• A central electronic folder holds details of all external speaker visits.  
• Implemented a new lanyard and ID procedure for all visitors, both at Selby HQ, London office and external visits to partner localities. | 4 | | SA | Aug 20 | GREEN |
<p>| | b. Inappropriate or extremist materials are shared with learners (face-to-face or via web links) because insufficient checks are made regarding external speakers and materials that they promote or share. | | | | | | | |
| | c. Policy is not well communicated to staff/students and not complied with. | | | | | | | |</p>
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| 4. Leadership | a. Leaders within the organisation do not understand the requirements of the Prevent statutory duty, or the risks faced by the organisation if the duty is not managed or suitably enabled at a sufficiently senior level.  
b. The result is the organisation does not attach sufficient priority to Prevent action plans (or does not have one), and therefore actions to mitigate risks and meet the requirements of the duty are not effective. | 8 | • TSN Lead Governor in place.  
• SLT have a clear understanding of the Prevent duty and members have previously attended a WRAP session.  
• All SLT have completed Prevent e-learning module.  
• All staff complete the Prevent e-learning module and WRAP sessions are delivered on a rolling programme.  
• Prevent Risk Register is updated regularly and discussed at quarterly Safeguarding Steering Group meeting and any other relevant meetings.  
• Prevent and British Values are embedded within the curriculum and also addressed via bespoke sessions. | 4 | | SA | Aug 20 | GREEN |
• Implemented a monthly Safeguarding and Prevent Operational Steering Group to monitor policy impact and ensure robust safeguarding/Prevent leadership.

• Updated all online training products to make sure content is relevant and high quality.

• Refreshed Deputy and Safeguarding Officers’ training through face-to-face workshops.
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| 5. Partnership working | a. The organisation does not establish effective partnership working with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others.  
   • The result is that the organisation is not fully equipped for handling national and local risks and does not have access to developing good practice advice or supportive peer networks. | 8 | • The DSL (single point of contact) works closely with DfE Prevent Leads and attends regional meetings when possible.  
   • DfE Leads share local updates and plans from wider Prevent Teams.  
   • Communicate effectively with all partner colleges to ensure safeguarding and Prevent policy and procedures are fully understood, implemented, and in line with partner expectations. | 4 | | RK | Aug 20 | GREEN |
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| **6. Promoting British Values (BV)** | a. Insufficient staff knowledge and confidence to exemplify British Values (BV) in their management and teaching, and through general behaviours in the institution. | 9 | • British Values and Prevent Topic of the Month.  
• British Values posters available for all centres.  
• Development of training around fundamental British Values, including how to embed this with learners.  
• Adapted resources to be delivered in training sessions to all staff – ‘How to embed British Values within the Curriculum’.  
• Teaching and Learning Prevent Implementation Plan.  
• British Values are embedded within TSN working culture and all curriculum activities. | 6 | • Continue to monitor staff training compliance.  
• Provide regular updates and reminders around Prevent and British Values. | SA | Aug 20 | **AMBER** |
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<tr>
<td>7. Staff training and awareness Pg. 1/2</td>
<td>a. Insufficient staff knowledge and confidence to exemplify British Values (BV) in their management and teaching, and through general behaviours in the institution. b. Staff receive insufficient training to be able to recognise this vulnerability and be aware of what action to take in response. c. Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation.</td>
<td>12</td>
<td>• WRAP training delivered on a rolling programme. • Prevent duty is included in all safeguarding training. • Tiered staff training – suggested by BIS Coordinator: o SLT – Leadership-focused WRAP training o DSL to attend ‘Train the Trainer’ and external training from Home Office o Communication sent to all staff to complete online training. • All policies and procedures updated to include Prevent. • Prevent resource section on Safeguarding intranet page – legislation, guidance, risk assessment etc. • Prevent awareness and e-learning module forms part of new staff induction. • Sub-contractors to complete e-learning – relevant managers to maintain a log of this. • E-learning training links shared with employers.</td>
<td>8</td>
<td>• Ongoing delivery of training. • Update all online training products to make sure content is relevant and of high quality.</td>
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<td>7. Staff training and awareness Pg. 2/2</td>
<td>a. Staff do not understand the factors that make people vulnerable to being drawn into terrorism, or know how to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism. b. Staff receive insufficient training to be able to recognise this vulnerability and be aware of what action to take in response. c. Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation.</td>
<td>12</td>
<td>• Prevent duty and how to report concerns is embedded in all safeguarding training. • Prevent and safeguarding posters printed and circulated in all centres. • Staff aware that all Prevent concerns must be reported using the new Safeguarding Reporting Form (SRF). • Process flow chart forms part of safeguarding policy. • All reports are logged and reported by DSL to SLT and Governors, and appropriate action taken.</td>
<td>8</td>
<td>• Ongoing delivery of training. • Update all online training products to make sure content is relevant and of high quality.</td>
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<td>8. Welfare and pastoral care</td>
<td>The organisation does not provide effective welfare and pastoral support, which results in learners (and staff) being unsupported and greater risk of vulnerabilities being exploited.</td>
<td>8</td>
<td>• All welfare and pastoral support is provided by Learner Support Advisors (LSAs) and Tutors, with referral to support agencies as required.</td>
<td>4</td>
<td>• Ensure all relevant Local Authority Designated Officers (LADO) are known in all regions where provision is delivered.</td>
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<td><strong>9. Prayer and faith facilities</strong>&lt;br&gt;a. Requirements of learners (or staff) requiring faith support or the use of facilities are not met by the organisation, resulting in individuals seeking external support of unknown suitability.&lt;br&gt;b. Facilities (either prayer rooms or quiet space facilities) provided are not effectively managed or supervised, and become ungoverned spaces where radicalising, inappropriate or dangerous activities can take place.</td>
<td>12</td>
<td>• Audit of centres providing rooms and usage monitoring systems completed and there are currently no requests for prayer/faith facilities, but each centre has identified a 'quiet' room for future use if required.&lt;br&gt;• Where possible, and as requested, a room is made available for learners/customers for prayer or quiet reflection. This has not been an issue, as room being requested for prayer is very rare; appointments are made to fit around prayer as required.&lt;br&gt;• A new Multi-Faith and Quiet Contemplation Room policy has been established. This has been distributed to all staff.&lt;br&gt;• Policy to be reviewed annually.</td>
<td>9</td>
<td>• Work with key partners (employers/colleges) to ensure facilities are available in remote sites.</td>
<td>SH / MH</td>
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| 10. Campus security | a. The organisation does not have sufficient security of its premises, and learners are targeted by individuals or groups seeking to share their extremist views or endanger their personal safety.  
  b. Charities are allowed on campus without effective checks, or charitable collections are inadvertently diverted to inappropriate or unlawful causes.  
  c. On-site, dangerous or hazardous substances are not kept secure and are allowed into the possession of individuals or groups seeking to use them unlawfully. | 12          | • All premises have security code operated doors and are manned by Reception staff.  
  • All visitors are required to sign in on entrance to premises.  
  • Any visiting speakers must be approved by the relevant staff.  
  • Hazardous substances are not accessible to learners – only cleaning products present on-site, and these are locked in cleaning cupboards.  
  • Implemented a new lanyard and ID procedure for all staff and visitors, both at Selby/London HQ and external visits to partner localities. | 8             |                       | SA  | Aug 20 | GREEN      |
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| 11. Incident management    | **a.** The organisation does not have a critical incident management plan which is capable of dealing with terrorism-related issues.                                                                 | 16          | • Develop and implement a critical incident management plan for all possible risks.  
• Centre Health and Safety Lead to be fully trained in possible critical incident responses and carry out/rehearse regular response activity with all staff.  
• Develop draft communication mechanisms to alert all staff in response to any critical incident.  
• Engage with all relevant external support agencies to support the organisation's response to any critical incidents. | 12            | • Ensure all partners (employers and colleges) have robust health and safety management plans in relation to critical incident risks.                                                                                                                                 | SA     | Aug 20 | GREEN      |
Addendum to The Skill’s Network’s (TSN) Safeguarding Policy

Appendix 9

Response to COVID-19

1. Introduction
There have been changes within our organisation in response to the outbreak. Many young people and adults are now at home and staffing is likely to be significantly affected through illness and self-isolation and the lockdown.

Despite the changes, our Safeguarding and Prevent Policy is fundamentally the same: young people and vulnerable adults always come first. Staff should respond robustly to safeguarding concerns and continue to follow the established safeguarding procedure.

This document sets out some of the adjustments we are making in line with the changed arrangements in our organisation and the advice from government and local agencies.

2. Responsibilities

2.1. The Skills Network Board
The Board shall ensure that there is a robust policy in place to ensure the continued safeguarding of young people and vulnerable adults whilst our organisation is implementing and following government advice in relation to the COVID-19 outbreak.

2.2. Designated Safeguarding Lead (DSL)
The Designated Safeguarding Lead (DSL) shall ensure that all safeguarding processes are fit for purpose during the period of time our organisation is responding to the COVID-19 outbreak and is unable to operate under normal conditions. The DSL shall ensure that staff are briefed and kept updated on any policy or process changes as they arise.

2.3. Staff
All staff shall ensure that they have read the addendum to the policy and that they continue to follow our organisation’s safeguarding processes as per the main policy, or in accordance with the addendum, where this is different. All staff should ensure they read the central communications being issued to ensure they are up to date with any changes to usual practices.
3. **The Skills Network’s position and local advice**

For our adult learners, our organisation will continue to operate as normal in supporting the delivery of our level 2 and level 3 distance learning qualifications. Staff are all working remotely, with our Selby office remaining open to provide a postal service and any critical IT or reprographics support.

For our Apprenticeships, our organisation has moved to remote learning for the vast majority of our Apprentices. Staff are all working remotely, with our Selby office remaining open to provide a postal service and any critical IT or reprographics support.

Local authority partners have advised that only the most critical safeguarding cases will be dealt with, with multi-agency meetings being held virtually.

Safeguarding referrals will be dealt with as usual in line with TSN’s policy and procedure by our learners, staff and relevant partners.

4. **Reporting arrangements**

Our organisation’s arrangements continue in line with our Child Protection Policy. The

Designated Safeguarding Lead is:
Stuart Allen, Stuart.Allen@TheSkillsNetwork.com, 07912 270 020.

The Deputy DSLs are:
Josh Hill, Josh.Hill@TheSkillsNetwork.com, 07860 850691 and
Ashleigh Penny, Ashleigh.Penny@TheSkillsNetwork.com, 01757606660.

The Designated Safeguarding Officer contact details are here.

Our organisation will ensure that the DSL/Deputy DSL or DSOs are contactable at all times our organisation is open. Any changes to this will be communicated via the daily COVID-19 communication each day.

Staff will continue to follow the safeguarding procedure as laid out in the main policy. The flowchart can be found here. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

The DSOs will ensure that timely referrals to (young people and vulnerable adults) are made, though the threshold for children’s services may be higher in the current circumstances. The DSO managing the case will advise on any further action that is required on the referrer’s part should it be required.

5. **Identifying vulnerability**

Vulnerable learners are defined by the government as those with a social worker, or with an Education, Health and Care Plan (EHCP).

Vulnerable adults are defined as someone who is aged 18 or over and:

- Has need for care and support (whether or not those needs are being met)
- Is experiencing, or is at risk of, abuse or neglect
- As a result of those needs, is unable to protect him or herself against abuse or neglect or the risk of it.
The government require our organisation to offer provision to vulnerable learners. All identified vulnerable learners’ emergency contacts have received information on how to access provision.

We have undertaken a scoping exercise to identify the most vulnerable children. Those learners with an EHCP, those with a social worker and those with a current live safeguarding case have been reviewed.

A risk assessment process is ongoing to risk-rate those learners where contact with the social worker/parents/carers is required, which will be coordinated through the Safeguarding Team.

We have put specific arrangements in place with respect to the following groups:

- Looked After Children – these will be risk assessed by our Training Team and tutor and liaison with their social worker will be instigated where necessary.
- Care leavers
- Learners with disabilities
- Vulnerable adults
- Learners with previous and live safeguarding referrals.

For these individuals, we continue to operate normal safeguarding policy and procedures but are providing increased communications and notifications to ensure they receive up-to-date advice and guidance during these challenging times.

In addition, the following groups have specific arrangements around contact and support from our organisation.

- Learners at home – learners are in contact with their Trainers/Tutors through remote learning activity, and Learner Support Advisors will be contacting learners periodically to ensure that they are safe and well. However, the vulnerable learners will be prioritised for this type of contact.

6. **Sub-contracting arrangements**

All policies and processes outlined within our organisation’s safeguarding policy and the addendum shall apply to our partners. This includes regular communication updates to ensure processes are being accurately followed and that we report all safeguarding concerns to our relevant primes. Our Apprenticeship Employer Engagement Manager is responsible for the communication and monitoring of employer settings for our Apprentices to ensure employer responsibilities in line with our policy and procedures are being effectively carried out.

7. **Attendance**

Where an Apprentice is expected to attend work and does not arrive, the employer is to report absence to our Apprenticeship Employer Engagement Team. One of our Learning Support Advisors (LSAs) will then contact the family. If contact is not possible by 10am, the DSL, or DSO must be informed. The DSL will attempt a range of methods to contact the parent/guardian, and if the Apprentice is classed as vulnerable, they shall also liaise with the appropriate agencies. If no contact is received within 24 hours, then the DSL/DSO may deem it necessary to undertake a home visit by the organisation or another appropriate agency. The risk of COVID-19 does not override the duty on our organisation to ensure children and young people and vulnerable adults are safe.
8. **Staff will be aware of increased risk**

The pressures on children and their families at this time are significant. There will be a heightened awareness of family pressures through being contained in a small area, and possible financial and/or health anxieties. These areas should be considered in the setting of any work for learners to undertake at home (including recognising the impact of online learning – see below). Staff will be aware of the mental health of both children and their parents and carers, informing the DSL about any concerns. This is also the same for vulnerable adults.

9. **Risk online**

Young people and vulnerable adults will be using the internet more during this period. Staff should be aware of the signs and signals of cyber bullying and other risks online. Staff should be aware that learners using their own Wi-Fi will not be subject to our organisation’s systems.

- Our organisation continues to have eSafe monitoring software in place which will monitor learners whilst they are using our organisation’s systems.
- Our Board will review arrangements to ensure they remain appropriate.
- Learners have been issued with advice and guidance on staying safe during the period of remote working.
- Our organisation will be issuing, via the website, useful tools and resources for parents to keep their children safe online.
- Free additional support for staff in responding to online safety issues can be accessed from the [Professionals Online Safety Helpline at the UK Safer Internet Centre](#).

10. **Allegations or concerns about staff**

With such different arrangements than usual, young people and vulnerable adults could be at a greater risk of abuse from staff or volunteers. We remind all staff to maintain the view that ‘it could happen here’ and to immediately report any concern, no matter how small, to the Safeguarding Team.

We have confirmed that the arrangements to contact the LADO at the local authority remain unchanged. Any concerns regarding a member of staff should be reported to the DSL immediately.

If necessary, the organisation will continue to follow the duty to refer to DBS any adult who has harmed or poses a risk of harm to a child or vulnerable adult.

11. **New staff or volunteers**

New starters must have an induction before starting or on their first morning with the DSL or a deputy. They must read our organisation’s Safeguarding Policy, the Behaviour Policy, the Whistleblowing Policy and the Code of Conduct. The DSL or Deputy DSL will ensure new recruits know who to contact if worried about a learner and ensure the new starters are familiar with the child protection procedure.
If staff or volunteers are transferring in from other registered education or childcare settings for a temporary period to support the care of children, we will seek evidence from their setting that:

- The member of staff has completed relevant safeguarding training in line with other similar staff or volunteers,
- They have read Part I and Annex A of Keeping Children Safe in Education, and
- Where the role involves regulated activity and the appropriate DBS check has been undertaken by that setting, we will undertake a written risk assessment to determine whether a new DBS would need to be undertaken. It may be in these exceptional times we can rely on the DBS undertaken by their setting.

Our safeguarding procedures hold strong:

- When undertaking ID checks on documents for the DBS, it is reasonable to initially check these documents online through a live video link and to accept scanned images of documents for the purpose of applying for the check. The actual documents will then be checked against the scanned images when the employee or volunteer arrives for their first day.
- Our organisation will update the Single Central Record of all staff and volunteers working in our organisation, including those from other settings. This will include the risk assessment around the DBS.

12. **New learners/Apprentices at our organisation**

Where learners join our organisation from other settings, we will require confirmation from the DSL whether they have a Safeguarding File or SEN statement/EHCP. This file must be provided securely before the learner begins at our organisation and a call made from our DSL or a deputy to the placing establishment’s DSL to discuss how best to keep the learner safe. In some unusual circumstances, this may not be possible. Information provided must include contact details for any appointed social worker. Safeguarding information about learners placed in our organisation will be recorded on our safeguarding system, and any updates will be shared with the placing establishment when the learner returns to them.

The DSL will undertake a risk assessment in respect of any new information received, considering how risks will be managed and which staff need to know about the information. This will be recorded on our safeguarding recording system.

13. **Approval**

This policy has been remotely approved by the Board and is available on our organisation’s website.
Additional advice and support

Abuse

- What to do if you’re worried a child is being abused – DfE advice
- Domestic abuse: Various Information/Guidance – Home Office (HO)
- Relationship abuse: disrespect nobody – Home Office website

Bullying

- Preventing bullying including cyberbullying – DfE advice
- Preventing and Tackling Bullying, DfE advice

Children missing from education, home or care

- Children missing education – DfE statutory guidance
- Child missing from home or care – DfE statutory guidance
- Children and adults missing strategy – Home Office strategy

Children with family members in prison

- National Information Centre on Children of Offenders (NICCO) – Barnardo’s in partnership with HM Prison and Probation Service

Child Exploitation

- Trafficking: safeguarding children – DfE and HO guidance

Drugs

- Drugs: advice for schools – DfE advice
- Drug strategy 2017 – Home Office strategy
- Information and advice on drugs – Talk to Frank website
- ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention – Website by MentorUK
‘Honour-based Abuse’ (HBA) (so called)

- Female genital mutilation: information and resources – Home Office guidance
- Female genital mutilation: multi agency statutory guidance – DfE, DH, and HO statutory guidance

Health and Well-being

- Fabricated or induced illness: safeguarding children – DfE, DH, HO
- Rise Above: Free PSHE resources on health, well-being and resilience – Public Health England
- Medical-conditions: supporting pupils at school – DfE statutory guidance
- Mental health and behaviour – DfE advice

Homelessness

- Homelessness: How local authorities should exercise their functions – Ministry of Housing, Communities & Local Government guidance

Online

- Sexting: responding to incidents and safeguarding children – UK Council for Internet Safety

Private fostering

- Private fostering: local authorities – DfE statutory guidance

Radicalisation

- Prevent duty guidance – Home Office guidance
- Prevent duty: additional advice for schools and childcare providers – DfE advice
- Educate Against Hate website – DfE and Home Office advice
- Prevent for FE and Training – Education and Training Foundation (ETF)

Upskirting

- Upskirting: know your rights – UK Government
Violence

- **Gangs and youth violence: for schools and colleges** – Home Office advice
- **Ending violence against women and girls 2016-2020 strategy** – Home Office strategy
- **Violence against women and girls: national statement of expectations for victims** – Home Office guidance
- **Sexual violence and sexual harassment between children in schools and colleges** – DfE advice
- **Serious violence strategy** – Home Office Strategy