Safeguarding Policy & Procedures

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Contents

Introduction

Get Set UK is committed to safeguarding participants and staff against harm; particularly those who are at risk of abuse or neglect. Get Set UK will provide an environment that promotes self-confidence, a feeling of worth and the knowledge that participant concerns will be listened to and acted upon. Get Set UK also recognises that participants' chances of active learning and finding and sustaining employment are drastically reduced if they are at risk of harm. Therefore, the robust safeguarding measures outlined in this policy complement our aims to help our participants succeed in learning and sustainable employment

This will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to individuals.
- Teaching individuals how to keep safe and recognise behaviours that are unacceptable.
- Identifying and making provision for any individual that has been subject to abuse.
- Ensuring that members of the team, advisors, tutors and assessors understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of abuse and know to refer concerns to the Designated Safeguarding Lead.

Get Set UK commits to providing a safe physical and emotional environment which promotes wellbeing, fairness and equality and discourages any form of abuse. This policy refers to all participants, learners and staff regardless of race, gender, age, religion or belief, disability and sexual orientation. It is the duty of all employees and subcontractors to Get Set UK to adhere to this policy.

Scope

This policy is applicable to all Get Set UK staff, customers, learners and clients (participants), associates and contractors. It is everyone's responsibility to ensure that the working environment is safe and secure to protect participants from potential harm.

This policy deals with the protection of children, young people and adults at risk of abuse or neglect. An adult at risk of abuse or neglect is a person who has attained the age of 18 and may be any of the following:

- An adult who has a learning difficulty and/or disability
- An adult who has a physical or mental illness, including addiction to alcohol or drugs
- An adult who has reduced physical or mental capacity or is dependent on others for the performance of basic physical functions.
- An adult who is unable to protect themself from assault, abuse or neglect.

Policy Statement

Get Set UK will carry out its responsibility under all relevant legislation, regulations and formal guidance for the protection of children, young people and adults at risk of abuse or neglect. We hold as one of our highest priorities the health, safety and welfare of all children, young people and

adults at risk of abuse or neglect who are involved in courses or activities that come under the responsibility of Get Set UK.

The Board of Directors is committed to ensuring that Get Set UK:

- Provides a safe environment for children, young people and adults at risk of abuse or neglect to learn in.
- Identifies adults who are suffering, or likely to suffer significant harm.
- Takes appropriate action to see that such children, young people and adults at risk of abuse or neglect are kept safe, both in Get Set UK, at home and outside the company.
- Refers concerns that a participant might be at risk of significant harm to the appropriate agencies.

Get Set UK will:

- Take an active approach to protecting children, young people and adults at risk of abuse or neglect from potential harm or damage. This includes supporting them and keeping them safe.
- Take all appropriate actions to address concerns about the welfare of children, young people and adults at risk of abuse or neglect.
- Place the child, young person or adult at risk of abuse or neglect at the centre of our concerns, and build policies, practices and procedures around them to ensure they are able to succeed.
- Work to agreed local policies and procedures in full partnership with other local agencies.
- Plan, implement, monitor and review policies and procedures to ensure that we do everything we can at Get Set UK to provide a safe environment for children, young people and adults at risk of abuse or neglect in both our Employability and our Skills teams.
- Work with employers to ensure that children, young people and adults at risk of abuse or neglect are safe in the workplace.
- Take all reasonable measures to ensure that risks from harm to the welfare of children, young people and adults at risk of abuse or neglect is minimised by appropriate.
    o Risk assessment and management
    o Health and Safety procedures
    o Staff selection, recruitment, induction, supervision and training
    o Creation and promotion of an open work culture, "Whistleblowing"
    o Reacting to, reporting and dealing with abuse.

Any adult can be subject to abuse or neglect and, as such, all allegations of abuse will be taken seriously and treated in accordance with the company's procedures. Get Set recognises that it is the responsibility of all staff to act upon any concern no matter how small or trivial it may seem.

To support this, the Executive Team will approve and review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of children, young people and adults at risk of abuse or neglect and the promotion of a safe environment for them.
- Ensuring the procedures for reporting and dealing with allegations of abuse against member of staff are in place.
- Ensuring the safe recruitment of staff in line with Safer Recruitment guidelines.

- Supporting, resourcing and training those who work with, or who come into contact with children, young people and adults at risk of abuse or neglect, and to providing appropriate supervision.

Responsibility for Safeguarding Policy

Responsibility for the development, implementation and monitoring of the Safeguarding Policy will be as follows:

- Allocated Board Level responsibility: **Thomas Harley, CEO/Director**
- Designated Safeguarding Lead (DSL): **Barbara Veeramallay- Permaul, Quality & Compliance Director**
- Deputy Designated Safeguarding Lead (DDSL): **Musharaf Malik**
- Deputy Designated Safeguarding Lead (DDSL): **Susan Feltham**

The Designated Safeguarding Lead will report to the Executive Team quarterly.

The Designated Safeguarding Lead will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other agencies such as social services.

The Deputy Safeguarding Lead will inform the Designated Safeguarding Lead about safeguarding concerns specific to each contract. All staff should be prepared to identify children, young people and adults at risk of abuse or neglect who may benefit from early help which means providing support as soon as a problem emerges at any point.

The Safeguarding Leads will need to know:

- How to identify the signs and symptoms of abuse and when to make a referral
- The local protection procedures and the Safeguarding Lead's role within them
- The role and responsibilities of the investigating agencies and how to liaise with them
- The requirements of record keeping
- Where this may fall under the remit of Prevent - The named Single Point of Contact (SPOC) for Prevent is **Barbara Veeramallay - Permaul**

Safeguarding Training

Induction processes for all Get Set UK staff who come into contact with our participants should include thorough training in Personal Safety and Professional Boundaries. All staff should be aware of the risks attached to placing themselves in situations where safeguarding or abuse allegations can arise. Particular consideration should be made when:

- Working in one to one situations with a participant.
- Transporting participants and volunteers by car on a one to one basis.
- Undertaking home visits on your own.
- Using outreach venues for one to one meetings with a participant.
- Working in a room with no internal vision panel.

All staff working with children, young people and adults at risk of abuse or neglect will receive training to:

- familiarise them with adult protection issues and responsibilities
- Understand Get Set UK safeguarding procedures and policies,
- identify and act upon potential indicators of abuse or neglect amongst participants.

Refresher training will take place at least every 3 years.

Definition of Abuse

Abuse is a violation of an individual's human and civil rights or dignity by another person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological; it may be an act of neglect or omission to act; or it may occur when an individual is persuaded to enter into a financial or sexual transaction to which he, she or they has/have not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

What is Safeguarding?

Safeguarding is not just about protecting individuals at risk from deliberate harm. It includes issues such as:

- Financial abuse (misappropriation)
- Homelessness
- Self-Harm
- Mental Health problems
- Bullying, including cyber bullying (by text message, on social networking sites etc) and prejudice-based bullying.
- Racist and homophobic or transphobic abuse
- Extremist views or behaviour
- Substance misuse
- Issues which may be specific to a local area or population, e.g. gang activity
- Domestic violence, sexual exploitation, female genital mutilation and forced marriage

(See Annex 1 For Categories of Abuse and Issues)

Signs and Indicators of Abuse

The signs of abuse are not always obvious, and a victim of abuse might not tell anyone what is happening to them. The victim might be scared that the abuser will find out. The victim may also worry the abuse will get worse. Victims may also want to protect the abuser or think they will not be believed. Sometimes, victims do not realise that what is happening to them is abuse. The effects of abuse may be short term or may last a long time – sometimes childhood abuse can affect people long into adulthood.

The following guidance is intended to help all Get Set Staff who have contact with adults who could be victims of abuse or harm. It should not be used as a comprehensive guide, nor does the presence of one or more factors prove that someone has been abused, but it may however indicate that further enquiries should be made. This is not an exhaustive list and some of these indicators could also reflect normal patterns of behaviour which is why professional judgement is

critically important.

- An unawareness or denial of any injury.
- Becomes secretive and reluctant to share information.
- Shows challenging/disruptive behaviour.
- Unexplained bruising or marks.
- Tiredness and/or being distracted when in the centre
- Nervousness and / or anxiety.
- Change in confidence or behaviour
- Change in personal presentation and/or personal hygiene
- Suddenly has expensive clothes or gadgets that can't be explained – or conversely doesn't have the same expensive items that they had before
- Talks in a way that indicates that he/she suffers from emotional abuse.

Advice to Staff on When and How to Take Action

If a participant comes to you with a report of apparent abuse, you should listen carefully to them, using the following guidelines. When listening to a an individual who is reporting abuse, staff **must**:

- allow them to speak without interruption
- never trivialise or exaggerate the issue
- never make suggestions
- never coach or lead them in any way
- reassure them, let them know you are glad they have spoken up and that they are right to do so
- always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know them – spare them having to repeat themselves over and over.
- try to remain calm – remember this is not an easy thing for them to do.
- do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- let them know that you are taking the matter very seriously
- make them feel secure and safe without causing them any further anxiety
- be honest – let them know that you cannot keep this a secret, you will need to tell someone else.
- Explain what you have to do next and who you have to talk to (Safeguarding Lead). Keep in contact with the learner and, if a Social Services interview is to follow, see that the learner has a 'support person' present if they wish (This may be yourself).

If you can, take notes, and invite the learner to help you to be as accurate as possible. Re-assure the learner that it was right to tell you, that you are sympathetic, that they are not alone, others have suffered in this way; that you are glad they spoke up. Use the learner's own words even if they use colloquial language or swear.

Staff should always start conversations by explaining that there may be some disclosures that they would need to flag or escalate and be very clear why that would be and what they would do in that

instance.

Once you suspect or know of any abuse of any participant, you should immediately inform the Designated Safeguarding Lead in person or by telephone. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact the Designated Safeguarding Lead to discuss your concerns. You should also contact the Designated Safeguarding Lead if you know or suspect that a member of staff or learner has a previous history of abuse of children or children, young people and adults at risk of abuse or neglect.

You **must not** try to investigate the matter on your own. Staff are not equipped or qualified to do so.

If, following your initial contact with the Designated Safeguarding Lead, it is decided that the matter should be taken further, a written report must be prepared. A written report is essential to prevent any misrepresentation of your findings, and should be sent to the Designated Safeguarding Lead within 24 hours of the suspicion arising.

The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to your suspicions, or the account given to you of abuse by the individual concerned, as accurately as you are able to record it. The report should be signed, dated and a copy stored in a secure place. If you are unsure about what to write, you can get advice from the Designated Safeguarding Lead.

What Happens Next

Taking into account all the information available, the Designated Safeguarding Lead will decide on the next steps, which may include taking no further action. Where the Designated Safeguarding Lead decides that further action is necessary, this may be to:

- Seek further advice from Social Services
- Make a referral to Social Services
- Report the incident to a designated Social Worker
- Report the matter to the police if a crime is suspected

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

The Designated Safeguarding Lead may consider that those involved may require counselling. Where it is felt there is a need for counselling (which could be for other learners, staff, parents or carers involved) the Designated Safeguarding Lead will make the necessary arrangements.

The Designated Safeguarding Lead will keep the member(s) of staff who raised the concerns informed of the progress/ outcome of the case where possible.

If a member of staff does not agree with a decision of the Designated Safeguarding Lead that no further action is necessary, the member of staff should refer these concerns in the first instance to the CEO. If the CEO does not recommend further action and the member of staff still has concerns, then the member of staff has the right and duty to refer the case directly to the local service responsible for the protection of vulnerable adults and should at the same time alert the CEO under the company Whistleblowing procedure).

Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the individual is the overriding concern. The degree of confidentiality will be governed by the need to protect the individual. They should be informed at the earliest possible stage of the disclosure that the information will be passed on. **All conversation regarding abuse or neglect should always be held in private.**

Get Set UK complies with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the vital interests of children, young people and adults at risk of abuse or neglect. In all cases the main restrictions on disclosure of information are:

- common law duty of confidence
- Human Rights Act 1998
- Data Protection Act 1998 and General Data Protection Regulation (GDPR),

Each of these has to be considered separately. Other statutory provisions may also be relevant, but in general, legislation does not prevent sharing of information if:

- those likely to be affected consent; or
- the public interest in safeguarding the individual's welfare overrides the need to keep the information confidential; or
- disclosure is required under court order or other legal obligations.

Whatever happens, you should always be open and honest with the individual if you intend to take the case further.

Staff must not discuss the case with anyone other than those involved in the case. If staff have any concerns about the progress of the case or have any other concerns these must be discussed with the Designated Safeguarding Lead.

Code of Behaviour

Staff must:

- Implement the Safeguarding Policy and Procedures at all times, including acting to promote participants' welfare, and report any abuse discovered or suspected immediately to the Designated Safeguarding Lead.
- Communicate with individuals in an open, professional manner (including during telephone conversations).
- Maintain an appropriate distance physically and professionally.
- Treat each individual equally and with dignity and respect. Their welfare must be put first.
- Dress appropriately and professionally.
- Be aware at all times of the effects and consequences that their words and actions might have.

Staff must never:

- Unlawfully discriminate, harass or victimise programme participants.
- Exploit their privileged position to obtain financial advantage at the expense of the participant nor accept gifts
- In any way threaten, bully or harass any participant, either face to face or online.
- Commit any form of crime with reference to the participant, or encourage them to commit a crime as a result of the privileged position of trust placed in the staff member.
- Knowingly place anyone in a potentially unsafe physical environment.
- Behave in a way that could be interpreted or is deemed to be 'grooming'
- Engage in rough, physical games including horseplay with participants.
- Allow or engage in inappropriate touching of any kind. The main principles of touch are:
  - Touch should always be in response to the individual's need
  - Touch should always be appropriate to the age and stage of development of the individual.
  - Touch should always be with an individual's permission
- Do things of a personal nature for an individual that they can do for themselves
- Physically restrain an individual.
- Make sexually suggestive comments to or within earshot of a participant.
- Have participants on their own in a vehicle. Where circumstances require the transportation of participants in their vehicle, another member of staff must travel in the vehicle. It is also essential that there is adequate insurance for the vehicle to cover transporting participant s as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a participant on their own, it is essential that the Designated Safeguarding Lead is notified immediately
- Spend time alone with a participant on their own, outside of the normal tutorial/ classroom situation. If you find you are in a situation where you are alone with a participant, make sure that you can be clearly observed by others.
- Engage in a personal relationship with a participant, beyond that appropriate for a normal teacher/ learner relationship, or in a sexual relationship.

Implications for staff

Staff who breaches any of the above may be subject to the disciplinary procedure. If an allegation against a member of staff has occurred, then an investigation will be carried out.

Get Set UK reserves the right to suspend any member of staff under the Safeguarding Policy to safeguard individuals whilst an internal and/or external investigation takes place. The company can implement its own internal investigation during any stage of this process. This may result in disciplinary action being taken on a member of staff (see below).

Allegations Against Staff

The primary concern of the Company is to ensure the safety of the individual. It is essential in all cases of suspected abuse by a member staff that action is taken quickly and professionally whatever the validity. There are occasions where an individual will accuse a member of staff of physically or sexually abusing them. In some cases this may be false or unfounded. However in

some cases the allegations may be true.

Any instance of suspected abuse by a member of staff is potentially gross mis-conduct. It is also a serious ordeal for an innocent person to be accused of such an act which can result in long term damage to their health and career.

In the event that any member of staff suspects any other member of staff of abusing an individual, it is their responsibility to bring these concerns to the Designated Safeguarding Lead. If the allegation concerns the Designated Safeguarding Lead, the matter should be discussed with the CEO.

The member of staff will be advised to keep records of all conversations, meetings attended, letters received and telephone calls relating to the allegation.

Type of Investigations

Criminal Investigations

If a crime is suspected, an investigation will not be carried out by the Company, other than to establish the facts. All the information obtained will be handed over to the police who will carry out any investigation necessary, with the support of the company.

Disciplinary Investigations

If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under the company disciplinary procedures.

Get Set UK may be unable to carry out any disciplinary proceedings until the police investigation is complete, but depending on the seriousness of the allegation, the member of staff may be suspended from work with pay until the investigation is complete.

Suspension of Staff

Suspension should not be automatic but may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Suspension should only occur for a good reason. For example:

- where an individual is at risk.
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- where necessary for the good and efficient conduct of the investigation.

Prior to making the decision to suspend, the Designated Safeguarding Lead and Head of HR should invite the member of staff to a meeting at which they have the right to be represented. This should occur with the approval of the appropriate agent from the local Safeguarding Board. In particular, if the police are engaged in an investigation the officer in charge of the case should be consulted.

The member of staff should be informed that they have the right to be accompanied either by their union representative or a work-based colleague. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made

clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

During the meeting, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, taking care not to interfere with the investigation into the allegation. The meeting is not intended to establish the member of staff's innocence or guilt, but to give the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

If the Designated Safeguarding Lead and Head of HR consider that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible, and ideally within one working day.

- the parents/carers of the individual making the allegation should be informed of the suspension (where appropriate). They should be asked to treat the information as confidential. Consideration should be given to informing the individual making the allegation of the suspension
- senior staff who need to know of the reason for the suspension should be informed

The suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with Get Set UK disciplinary procedures.

Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Executive Team, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the Get Set UK's procedures and/or policies and/or procedures. Consideration should also be given to the training needs of staff.

Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about Get Set UK's statutory duty to inform the Disclosure and Barring Service (DBS).

Policy Review

This policy shall be reviewed annually and amended accordingly at intervals not exceeding 12 months.

Version Control

Version	Date	Purpose / Changes	Author
V8	02/09/23	Included legislation 'Keeping Children Safe in Education' 2022	BV - Permaul
V7	02/08/23	Annual Review	BV - Permaul
V6	01/08/22	Annual Review	Cat Barton
V5	01/08/21	Update Covid Guidance, reformatting and review	Cat Barton
V4	01/05/21	Update Covid Guidance, review	Phil Henderson
V3	01/04/19	Update Covid Guidance, review	Phil Henderson
V2	01/04/18	Review	Phil Henderson

Annex 1 – Categories of Abuse and Issues:

Adults at Risk - An 'adult at risk of harm' is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their personal characteristics and/or life circumstances. The Care Act 2014 establishes that an "Adult at Risk" is any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation. Not all vulnerable adults will be considered an 'adult at risk' requiring a referral to the statutory agency.

Safeguarding Children - It is the duty of government and society as a whole to keep children safe. We have a responsibility to do this in Customer Services as the nature of our work, often sensitive and difficult, presents specific child-related challenges. The children we encounter through the immigration system, whether accompanied or unaccompanied, can be particularly vulnerable and so we must be vigilant to ensure we promptly identify and act where we identify safeguarding concerns.

Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions. Some of the recognised signs of physical abuse are unexplained burns, scratches, bruising and abrasions, anxiety in the presence of the abuser.

Domestic violence – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

Sexual abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse – including theft, fraud, internet scamming, 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.

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.

Forced Marriage - Forced marriage is a form of abuse. It can lead to domestic violence as it is a form or oppression which may generate physical violence, emotional, sexual or psychological abuse. Forced marriage is significantly different to an "arranged marriage" where consent is given. "A forced marriage is forced when conducted without the valid consent of both parties and where duress is a factor" (Choice by Right, HMO). Where a party to a marriage has not given consent or is in any way put under pressure (for example by emotional blackmail, threat of violence,

abduction) that is considered to be a forced marriage.

Discriminatory abuse – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

Hate Crime - Hate crime or incidents means any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, beliefs, gender identity or disability. Anyone can be a victim of hate crime or incidents regardless of race, age, disability, sexuality or gender. Lesbian, gay, bisexual and transgender (LGBT) individuals could face additional concerns around homophobia and gender discrimination. Individuals may be concerned they will not be taken seriously, recognised as a victim. Abusers may also control their victims by threatening to 'out' them to friends and family or support services.

Cyber Abuse / Sexting - Cyber bullying is facilitated through electronic technology which includes devices and equipment such as cell phones, computers and tablets. Communication tools are also utilised such as social media sites, chat and websites. Examples of cyber bullying are rumours sent via e-mail or posted on social networking sites and embarrassing pictures, videos, and fake profiles.

Mate Crime - This term is understood to refer to the befriending of people who are perceived by perpetrators to be vulnerable, for the purpose of taking advantage of, exploiting and /or abusing them. The relationship is likely to be of some duration and, if left unchecked, may lead to a pattern of repeat and worsening abuse. Mate crimes are likely to happen in private, often in the victim's homes. It can also occur via social media, where victims are financially or sexually exploited after being befriended online. Whilst this crime can affect many people, individuals with learning disabilities, mental health, older people and those with substance abuse issues are all at greater risk.

Organisational abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice because of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating 27 Care and Support Statutory Guidance 2016 (revised in Feb 18). Issued Under the Care Act 2014. Department of Health, October 2014 Co-Member Handbook 272

Self-neglect – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Criminal Exploitation (e.g. County Lines) - Criminal exploitation is when gangs and organised crime networks groom and exploit vulnerable people (including children and young people) to sell drugs. Often these people are made to travel across counties (known as 'county lines') and, and they use dedicated mobile phone 'lines' to supply drugs. We have a duty to be vigilant and look for the signs of criminal exploitation to protect our participants.

Radicalisation and Extremism - One area of Safeguarding (Prevent) involves protecting

individuals from the risk of radicalisation and extremism of any type. The Prevent strategy is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

Annex 2 – Visiting External Speakers and Events

We encourage visits from external agencies and speakers to enrich the experiences of our learners. However, it is important that we do not use agencies that oppose Get Set UKs values and ethos. Therefore, we are responsible for vetting any visitors to make sure the safety, security and welfare of learners and staff are prioritised.

How to book external visitors to ensure safety

- Complete the Risk Assessment for any visitors (below) before inviting any external speaker into any class. If there is a YES response to any of the 3 key questions, you must gain written approval from a director of Get Set UK before the event can go ahead.
- All visiting speakers must agree to our code of conduct policy.
- Talk to the speaker about the content of their presentation before the event. 4. Ask the visiting speaker to bring identification and arrive in good time to sign in.
- Always supervise your visitors and do not leave them alone with learners unless a DBS certificate has been presented.
- End any presentation where the content proves unsuitable or offensive.
- Complete an evaluation. This should make a note any contentious subject area or comments and state whether the speaker could be booked again in the future. Once a person has already visited, future checks should be proportionate.
- If any member of staff has any concern regarding a venue or event, they should contact a company Director of Get Set UK on 0203 735 8955.

Part 1: Event Organiser details:
Name:
Contact details (phone no. and email):
Part 2: Proposed event details:
Speaker's name:
Speaker's role:
Speaker's organisation:
Proposed event title:
Proposed event date:
Event description (max 50 words, including topics to be discussed):

Target audience (profile and size). Please give details if you believe the event will attract any groups or individuals that have previously been known to express views which may conflict with Get Set UKs values and ethos.
Proposed External Speaker(s): Please include links to biographical information and give details if you believe that any of your proposed speakers have previously been prevented from taking part in an event at any educational establishment

Annex 3 – E-Safety

Introduction

Get Set UK is committed to providing a quality enriched learning journey and we recognise the benefits and opportunities which new technologies offer to teaching and learning. We provide access to ICT systems and internet to staff and, where appropriate, our clients (customers/participants/learners/apprentices). We encourage the use of technology in order to enhance skills, promote achievement and enable lifelong learning. However, the accessibility and global nature of the internet and variety of technologies available mean that we are also aware of potential risks and challenges associated with such use.

Individuals may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some individuals may find themselves involved in activities which are inappropriate, or possibly illegal through social networking sites etc. including 'cyber-bullying'. This can be categorised in to three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users and
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

We will implement, and monitor the effectiveness of, appropriate safeguards throughout our delivery while supporting staff and clients to identify and manage risks independently and with confidence. We believe this can be achieved through a combination of security measures, training, guidance and implementation of our policies. We will do all that we can to make our clients and staff stay e-safe and to satisfy our duty of care. This e-safety policy should be read alongside other relevant centre policies including but not limited to: Prevent, Internet and Email Usage, Social Media Usage, Learner Safeguarding and Anti-Harassment policies.

Scope

The policy applies to the whole organisation, including staff, associates, clients and employers who have access to and are users of centre ICT systems, and/or expected to use ICT as part of their qualification with Get Set UK, both in and away from the centre. The e-Safety Policy applies to all use of the internet and forms of electronic communication such as email and mobile phones.

Roles and Responsibilities

All staff are responsible for ensuring the safety of clients and should report any concerns immediately to their line manager and/or designated e-safety officer. Any report of an e-safety incident will be dealt with in accordance with the organisation's learner safeguarding policy.

e-Safety Officer:

The e-Safety Officer is responsible for keeping up to date with new technologies and their use, as well as maintaining CPD. They will be expected to complete, review and update the e-Safety Policy, deliver staff development and training, record incidents and report any developments and incidents to the board.

The designated e-safety officer is:

Susan Feltham: susan.feltham@getsetuk.co.uk

In the absence of the e-safety officer, please contact the designated safeguarding officer:

Andrea Gregory: Designated Safeguarding Officer (DSO), 01268 270648, 07764 969337, andrea@getsetuk.co.uk

Clients (customers/participants/learners/apprentices)

Clients are responsible for using Get Set UK's IT systems, where appropriate, in accordance with the organisation's e-Safety rules and Digital Values, as described in the Learner Induction pack, which they must sign at the time of induction. Clients must act safely and responsibly at all times when using the internet and/or mobile technologies. They must follow reporting procedures where they are worried or concerned, or where they believe an e-safety incident has taken place involving them or another learner or member of staff.

Staff

All staff are responsible for using Get Set UK's IT systems and mobile devices in accordance with the company's PREVENT Internet & Email Usage policy, Social Media Usage policy and the e-Safety Rules and Digital Values included within this policy, which they must sign and submit to the e-Safety Officer. Staff are responsible for attending staff training on e-safety and displaying a model example to clients at all times through embedded good practice.

Online communication with clients is restricted to approved company networks. External platforms not hosted by Get Set UK, such as e-portfolio systems, may be used only where they have been approved by the e-safety officer.

All staff should apply relevant company policies and understand the incident reporting procedures. Any incident that is reported to or discovered by a staff member must be reported to the e-Safety Officer and/or line manager without delay.

Appropriate Behaviour

Get Set UK will not tolerate any abuse of IT systems. Whether offline or online, communications by staff and clients should be courteous and respectful at all times. Any reported incident of bullying or harassment or other unacceptable conduct will be treated seriously and in line with legal requirements and the relevant company policies.

Security

Get Set UK will do all that it can to make sure the company IT network is safe and secure. Every effort will be made to keep security software up to date. Appropriate security measures will include the use of enhanced filtering and protection of firewalls, servers, routers, workstations etc. to prevent accidental or malicious access of Get Set UK systems and information. Digital communications, including email and internet postings, over the company network, will be monitored in line with the Internet and Email Usage policy.

Risk Assessment

In making use of new technologies and external online platforms, the e-safety officer must first carry out a risk assessment for e-safety. This consists of a series of questions on the suitability of the technology as well as a section in which they can record any relevant comments or evidence generated. All forms must be submitted to the company directors for their consideration and approval

Use of Images and Video

The use of images, or photographs, is popular in teaching and learning and should be encouraged where there is no breach of copyright or other rights of another person (e.g. images rights or rights associated with personal data). This will include images downloaded from the internet and those belonging to staff or clients.

Clients and staff will receive training on the appropriate use of images, as well as the risks when taking, downloading and posting images online and making them available to others. There are particular risks where personal images of themselves or others are posted onto social networking sites, for example.

Our aim is to reinforce good practice as well as offer further information for all users on how to keep their personal information safe.

Photographs of activities on the premises should be considered carefully and have the consent of the company directors and any identifiable staff/clients before being published to the internet or used for marketing purposes.

All clients must complete a photo/video consent form where their image is to be used for marketing purposes and/or published to the internet.

Personal Information

Get Set UK collects and stores the personal information of clients and staff in accordance with GDPR and the company's Data Protection policy.

No personal information can be posted to the company's website without the approval of a Director and unless it is in line with our Data Protection Policy. Only names and work email addresses of staff, where applicable, will appear on the company website. No staff or clients' personal information will be made available on the website without consent.

Staff must keep clients' personal information safe and secure at all times. When using an online platform, all personal information must be password protected. Every user of IT facilities is required to log off or lock their computer where they are physically absent from a device for any period.

All company mobile devices such as laptops, are required to be password protected and signed out by a member of the IT team before leaving the premises, using an Equipment Sign Out form. Where equipment is allocated to an employee for their duration of employment, the employee is required to complete a Staff Equipment Form.

Where the personal data is no longer required, it must be securely deleted in line with the Data protection and retention policy.

Education and Training

With the current unlimited nature of internet access, and ever-changing technologies, it is impossible for Get Set UK to eliminate all risks for staff and clients. It is our view therefore, that the company should support staff and clients stay e-safe through updates. This will provide individuals with skills to be able to identify risks independently and manage them effectively.

For clients

Clients will receive e-safety training as part of their programme. Where updates and new technologies are introduced, these will be communicated to all affected clients.

Within teaching, learning and assessment, clients will be encouraged to question the validity and reliability of materials researched, viewed or downloaded. They will also be encouraged to respect the copyright of other parties and to cite references properly. They must not use the internet to incite others to view radically motivated websites.

When attending an online training session Get Set UK's policy is for all learners to have working cameras turned on to ensure they are in a safe environment and not vulnerable to abuse.

For staff

Staff will receive updates when new technologies are introduced and as appropriate throughout the year. This will be led by the e-Safety Officer and will take the format of a workshop, allowing staff hands-on experience. Further resources of useful guidance and information will be issued to all staff following the session. Each member of staff must record the date of the training attended on their CPD/training plan. They will also receive a certificate of attendance.

Any new staff will receive e-safety training, where appropriate, led by the e-safety Officer or other designated person, and full training on the company IT system by an appropriate person. They will also be provided with a copy of the company handbook, as part of their terms and conditions of their contract, detailing all policies mentioned throughout this document.

Associate staff will be invited to attend training provided by Get Set UK. If they are unable to do so they must provide evidence of their own CPD in this area.

Digital Values

Get Set UK has compiled a set of e-Safety rules, our 'Digital Values' from training and consultation sessions. These have been built into the learner Induction pack as well as being displayed on our e-portfolio system. These have been agreed by, and communicated to, all staff.

We expect our staff and clients to:

- **Protect passwords:** Ensure passwords are strong and not shared with anyone
- **Have clear boundaries:** Maintain boundaries between personal and professional lives and activities
- **Share information cautiously:** Nobody's information should be shared without their

permission

- **Respect ownership rights:** Observe copyright and referencing rules
- **Think before we post!:** Act with integrity and have respect for others in online communities including Facebook, Twitter and LinkedIn
- **Think before we type!:** Only use professional and appropriate language in all communication. Ensure nothing we write is open to misinterpretation
- **Think before we click!:** Not download anything or open any link unless we are confident that is it safe
- **Stick to policy:** Follow company guidelines for personal use of ICT and social media
- **Report it!:** Inform the e-safety officer of any incidents and/or concerns
- **Be committed to improve:** Display commitment to improving digital literacy skills and keep up to date with changes to e-safety requirements and new technology

Delivering learning online safely

Delivering learning online has its own unique safeguarding implications over and above those which are normally important for delivering learning face to face. These particularly apply to privacy and data protection, professionalism, safe use of technology and staff welfare. Existing safeguarding policies still apply. Therefore, tutors and learners should be aware of their general responsibilities and the procedures for reporting safeguarding issues:

Staff and tutors delivering learning online should be aware of the following:

- Privacy and Data Protection
- All learners should agree to an online code of conduct before taking part in learning sessions. This should include agreements on recording, image sharing, language, punctuality, privacy for members of a learner's household and other classroom norms such as respect and politeness.
- The time, date, attendance and length of online sessions with learners should be documented, as appropriate. Where possible, live events should be recorded by providers (with consent from learners) in case of future dispute.
- Providers should be clear about how recordings will be stored, how long they will be kept for and who will have access to them in line with Data Protection requirements.
- Where possible, staff should not use personal phones, e-mails, or social media accounts to contact learners.
- If staff members are accessing learners' contact details at home, they must comply with the GDPR.
- Any resources shared should take licensing and copyright into account.

Safe use of technology

- All staff should use provider-approved communication channels and not use any personal accounts. This includes blocking personal phone numbers.
- Delivery staff should keep online sessions as invitation-only and maintain privacy settings on posted materials.
- Learners should be given information on how to turn off cameras if needed.
- Tutors should be mindful of language and personal support to learners online as acceptable classroom behaviour can be misinterpreted online.

Professionalism

When taking part in online learning, staff and learners should ensure they are in a private environment and make sure that backgrounds in videos do not share any personal information or inappropriate content.   Staff should continue to follow professional appearance/behaviour expectations and maintain professional boundaries. One-to-one contact with any learner should only take place by telephone or written communication using a work phone (or a phone with a blocked number).

Staff Welfare

- Additional technical support and guidance should be given to staff lacking skills or confidence.
- Staff should not be required to live stream sessions where other options are possible.

Development and review

Get Set UK involved the whole organisation in the writing of the e-safety policy through team meetings, training sessions and activities.

Review of the policy will take place bi-annually or more frequently, in response to, significant developments in the use of technologies, which will impact the organisation and its clients, new threats to e-safety or any serious incidents, should they occur.

Incident reporting

Where an e-safety incident is reported to TheLightBulb, this matter will be dealt with very seriously and in accordance with the reporting procedure.

The company will act immediately to prevent, as far as reasonably possible, any harm or further harm occurring. If a learner wishes to report an incident, they can do so to their Learning and development mentor, trainer, or to the company e-safety Officer. Where a member of staff wishes to report an incident, they must contact their line manager or e-safety officer as soon as possible. Following any incident, the company will review what has happened and decide on the most appropriate course of action. External agencies may be involved, or the matter may be resolved internally depending on the seriousness of the incident.

Incidents should be reported using the e-safety incident report form and submitted to the e-safety officer for review. The e-safety officer will log all incidents reported.

E-safety Risk Assessment form

Site	Use	Who will access	Risk (low, medium, high)	Any other comments
Skills Forward (Forskills)	Support learners/apprentices with Functional Skills delivery	Delivery staff and apprentice learners/apprentices will access via a webpage.	Low	
Learning Assistant	Upload and assessing of learners/apprentices work.	Delivery staff and apprentice learners/apprentices will access via a webpage.	Low	
Facebook	Publicise and promote TLB through social media	Matthew Smith	Low	
LinkedIn	Publicise and promote TLB through social media	Matthew Smith, Suzanne Tilling and staff utilising this networking platform	Low	
Padlet	Used as a postit sharing page for staff and learners/apprentices	Emily Casson Matthew Smith Staff and learners/apprentices will access a read only webpage.	Low	
Bitly	Track individual site traffic	Emily Casson	Low	
Dictionary.com	Staff and learners/apprentices encouraged to download from App store and iTunes	Staff and learners/apprentices	Low	

X	Publicise and promote TLB through social media	Matthew Smith	Low	
Instagram	Publicise and promote TLB through social media	Matthew Smith	Low	
Awarding Organisations	Access to register and gain learner results	Suzanne Tilling, Emily Casson, Amy Maggs	Low	
End point assessment organisation portals	Access to administer EPA bookings and gain learner results	Suzanne Tilling, Emily Casson,	Low	

E-SAFETY INCIDENT FORM

Learner:	
Programme:	
Employer:	

Report Raised by:	**Date**:

Details of concern: (Please attach any notes using the Learner's own words)

Evidence (if additional to the above):

Reported to:

Annex 4 – Prevent Policy

Introduction and Context

All FE Providers have a duty to safeguard their learners/apprentices and employees, and PREVENT is about safeguarding learners/apprentices to keep them both safe and within the law. The PREVENT duty is not about preventing learners/apprentices from having political and religious views and concerns but about supporting them to use those concerns or act on them in non-extremist ways.

This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns and protection for those learners/apprentices and staff who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions.

Radicalisation is defined as the process by which people come to support terrorism, extremism and, in some cases, to then participate in terrorist groups.

Extremism is 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, whether in this country or overseas (HM Government Prevent Strategy, 2011).

The Aims of our Prevent Policy

This policy has the following aims:

- To promote and reinforce a set of shared values, founded on tolerance and respect for others.
- To create a safe space for free and open debate.
- To promote a sense of community cohesion both within Get Set UK and within its wider external community.
- To ensure that learners are safe and that we create an environment that is free from bullying, harassment, and discrimination.
- To support learners who may be at risk from radicalisation and to be able to signpost them to further external sources of support where appropriate.
- To ensure that all staff are aware of their responsibilities under this policy and they are able to recognise and respond to vulnerable learners.

This policy should be read in conjunction with Get Set UK Safeguarding Policy and the Equality and Diversity Policy.

Defining British Values

For the purposes of this policy, British values will be defined as:

"*Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different backgrounds, characteristics, beliefs and faiths*"

This definition is a natural extension of the three core values of Respect, Responsibility and Professionalism.

Equality and Diversity and Community Cohesion

Get Set UK aims to build resilience, guide our learners/apprentices to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take extremely seriously our key role in preparing all learners/apprentices and, in particular, young adults for life in modern Britain.

We aim to encourage working towards a society with a common vision and sense of belonging by all. Communities; a society in which the diversity of people's backgrounds and circumstances is appreciated and valued; a society in which similar life opportunities are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in schools and in the wider community.

All reasonable steps will be taken to ensure suspicions and allegations are taken seriously, responded to quickly and appropriately and that extremist organisations are not inadvertently funded.

National Guidance and Strategies

PREVENT is a key part of the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation.

The PREVENT strategy objectives are:

Ideology	respond to the ideology challenge of terrorism and extremism and the threat we face from those who promote them
Individuals	prevent people from being drawn into terrorism and extremism and ensure that they are given appropriate advice and support
Institutions	work with sectors and institutions where there are risks of radicalisation which we need to address.

Building Resilience and Preventing Radicalisation

All staff complete on line training as part of their induction and so have an awareness of the PREVENT agenda, and understand what 'radicalisation' means and why people may be vulnerable to being drawn into terrorism as a consequence of it. They are aware of what is meant by the term 'extremism' and the relationship between extremism and terrorism. They know what measures are available to prevent learners/apprentices from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it. They understand how to recognise vulnerabilities or worrying changes in behaviour and how to obtain support for learners/apprentices

who may be being exploited by radicalising influences. Learners/apprentices complete on line training at induction. Hot Topics look at current issues in the public eye giving learners/apprentices opportunities to apply their knowledge and understanding.

Identifying Prevent Concerns

As part of wider safeguarding responsibilities, Get Set UK staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of Get Set UK, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Changes in behaviour, friendship or actions and requests for assistance
- Local authority services and police reports of issues affecting learners in Get Set UK's delivery locations.
- Learners voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or "hate" terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

Risk Indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism.

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a person or their family may be vulnerable or involved with extremism:

Vulnerability

Identity crisis:	Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
Personal crisis:	Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
Personal circumstances:	Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

Unmet aspirations:	Perceptions of injustice; feeling of failure; rejection of civic life.
Criminality:	Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to Extremist Influences

- Reason to believe that the person associates with those known to be involved in extremism.
- Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence.
- Use of closed network groups via electronic media for the purpose of extremist activity.

Experiences, Behaviours and Influences

- Experience of peer, social, family or faith group rejection.
- International events in areas of conflict and civil unrest had a personal impact on the person resulting in a noticeable change in behaviour.
- Verbal or written support of terrorist attacks.
- First-hand experience of racial or religious hate crime.
- Extended periods of travel to international locations known to be associated with extremism.
- Evidence of fraudulent identity/use of documents to support this.
- Experience of disadvantage, discrimination or social exclusion.
- History of criminal activity.
- Pending a decision on their immigration/national status.

More Critical Risk Factors

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance/behaviour.

Referral and Intervention Process

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the person supports terrorism and/or extremism, or is in the process of being radicalised, must be reported to a named Designated Safeguarding Person or the Education and Skills Director immediately and no later than the end of that working day using the Safeguarding/Prevent Incident Form.

Channel Referral Process

Some concerns which are identified may have a security dimension to them, for this reason, it is important that liaison with the police forms an early part of all investigations. The Police will carry

out an initial assessment and, if appropriate, set up a multi-agency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the person.

FE Prevent Co-Ordinator

FE Prevent Co-Ordinator for London is Jennie Fisher
Email: jennie.fisher@education.gov.uk
Telephone: 07880 469 588

https://www.gov.uk/guidance/regional-further-education-fe-and-higher-education-he-prevent-coordinators

Regional Further Education/Higher Education Prevent Co-ordinators play a key role in the delivery of Prevent, providing further and higher education providers with support to build resilience against the dangers of radicalisation.

They do this through strategic engagement with senior leaders and through the provision of advice, support and training (including WRAP - Workshops to Raise Awareness of Prevent) to staff in universities, colleges and alternative providers. They also facilitate coordination between stakeholders involved with the delivery of Prevent in the HE and FE Sectors.

Their role might include, for example: briefings to vice-chancellors, principals and governors; delivering training; engaging with students; assisting with institutional policies; attending compliance working groups and providing advice and guidance regarding referrals and external speaker requests. Coordinators act as the conduit between universities and colleges and other stakeholders, including Local Authorities, Ofsted, Office for Students, the Police, Home Office and Department for Education.

Further Information and Staff Training

The Education and Training Foundation have created a website with information and resources which support staff at all levels across the organisation. All members of staff, associates and sub-contractors are required to complete the training.

The link to the website is http://www.preventforfeandtraining.org.uk/ and we recommend that all staff visit this site to gain further knowledge.

Annual staff training is undertaken to ensure all staff members have up to date knowledge and mandatory training takes place at point of staff recruitment and induction.

Responsibilities

All staff are responsible for completing and maintaining training on preventing radicalisation and extremism and for making themselves aware of the procedures contained within this document.

The Designated Safeguarding Lead has overall strategic responsibility for the implementation of this policy and for reporting concerns to external agencies as appropriate.

Safeguarding/Prevent Incident Form

Learner Name:	
Programme:	
Employer (If applicable):	
Report Raised by:	Date:
Details of concern:	
Evidence (if additional to the above)	
Reported to:	
Action Taken:	
Additional Support Agreed:	

Follow up Action Required		1 Week		1 Month		3 Month		6 Month
Director Signature:				Date:				

Annex 5 – Remote Working Guidelines (Remote Learning During Lockdown)

Get Set UK follows guidance from UK Government and NHS England for FE Providers and Independent Training Providers https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-further-education-provision/further-education-covid-19-operational-guidance

This includes:

Provision of remote learning to participants unable to attend on-site, e.g. for COVID-19 related reasons

For participants unable to attend on-site, for example, because they need to self-isolate for COVID-19 related reasons, we provide remote education to minimise disruption to their learning.

While participants are unable to attend on-site, we should use our best endeavours to deliver as much of participants' planned hours as possible and meet the expectations concerning participation, live teaching, feedback, assessment, attendance and engagement.

We recognise that for some participants the full delivery of planned hours may not be possible, for example where a student is undertaking a course involving practical teaching and training which necessitates the use of specialist equipment and supervision or with respect to work experience and placements.

Contingency planning

For individuals or groups of self-isolating participants following local or national government guidance, e.g. related to COVID-19, remote education plans are put in place.

We will continue to operate as normally as possible. In the event that restrictions in education are needed to help contain the spread of the virus, we may be asked to revise our delivery models for a short period of time. To help with this, the government have published a contingency framework, which outlines how we should operate in the event of any restrictions.

Any decision that there should be local restrictions in any education settings will be made by central government on a case-by-case basis.

Remote delivery expectations

In circumstances where we need to deliver remotely, e.g. for COVID-19 related reasons, the following minimum expectations should be met.

Expectations on participation

We set clear expectations of participants concerning their participation in the remote elements of their programme, so they know when and how they are expected to engage and demonstrate their learning.

Live teaching

As far as possible, we provide live online teaching. This is advised because Ofsted and many providers have found that learners generally prefer interactive 'live' online lessons and that it results in greater engagement. Alternatives to live lessons may include recorded lessons.

Feedback and assessment

We confirm with participants the different ways in which they will receive individual assessment and feedback when learning remotely to support their progression. The nature and frequency of remote assessment and feedback should reflect the individual need and the courses they are enrolled on.

Monitoring attendance

We have systems in place to:

- check, at least weekly, for persistent non-attendance or lack of engagement with remote education
- quickly agree ways in which attendance and participation can be improved

We give particular consideration on how best to support vulnerable and disadvantaged participants and participants with disabilities. We recognise that some participants with disabilities may not be able to access remote education without support and we work with them and their families/carers (where applicable) to deliver support for their level of need.

We have a named senior leader with overarching responsibility for the quality and delivery of remote education (Sues Duncan, Education and Skills Director), who ensures that provision meets the above expectations.

Support for participants who are unable to access remote digital education

Get Set UK will identify funding streams and support to help participants who are unable to access remote digital education. For example during Covid-10, the get help with technology service provided support with devices and connectivity for 16 to 19 year olds. This formed part of a £400 million investment to help children and young people continue their education at home and access online social care services. Connectivity grants were available, e.g. in the event of COVID-19 disruption to education. These were to help young people in further education who do not otherwise have access to adequate internet connectivity at home.

We also use the 16 to 19 bursary fund to provide financial support to help participants overcome specific financial barriers to participation so that they can remain in education. This may include the provision of devices and connectivity support. As set out in the 16 to 19 bursary fund guidance, we decide what support a student needs on the basis of individual assessment, in line with bursary fund rules.

For adults aged 19 and over we use learner support funds to purchase IT devices or internet access for disadvantaged participants to help them meet technology costs, where these costs are a barrier to accessing or continuing in their training.

Support for high-quality remote and blended education

[Get help with remote education](#) provides:

- guidance for tutors seeking help with delivering remote and blended education
- help to access technology to support remote education
- peer-to-peer training and guidance on how to use technology effectively
- links to practical tools, a good practice guide and provider-led webinars to support effective remote and blended delivery

Mental health and wellbeing

Many participants and staff members will be feeling uncertain and anxious at this time. It is important to support positive mental health and wellbeing, which is necessary for participants to engage in learning.

We identify participants and members of staff who may need additional support and engage with them and their representatives to understand their needs and ensure they have appropriate mental health and wellbeing support in place. Vulnerable participants are particularly likely to need additional support with their mental health and wellbeing.

We work with local authorities and voluntary sector mental health organisations to ensure that support is in place. In some cases support from specialist staff or support services can be given over the phone for participants who are self-isolating.

Annex 6 – Further Information

This annex contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which

may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is

necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance

and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell 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 (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

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

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures

that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home : Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: here.

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.

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.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at https://www.gov.uk/guidance/forced-marriage. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers[1] that requires a different approach (see following section).

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried

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[1] Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.[2] Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding

- **Extremism** [3]is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** [4]refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** [5]is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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[2] Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

[3] As defined in the Government's Counter Extremism Strategy https://www.gov.uk/government/publications/counter-extremism-strategy

[4] As defined in the Revised Prevent Duty Guidance for England and Wales. https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-Wales

[5] As defined in the Terrorism Act 2000 (TACT 2000) http://www.legislation.gov.uk/ukpga/2000/11/contents

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard [6] to the need to prevent people from being drawn into terrorism".[7] This duty is known as the Prevent Duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

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.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. Statutory guidance on Channel is available at: Channel guidance.

Additional support

The Department has published further advice for schools on the Prevent duty. The advice is

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[6] According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

[7] "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

Peer on peer/ child on child abuse

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It **can** happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. This **can** include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Sexual violence and sexual harassment between children in schools and colleges

Context

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 [8]as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault:

A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour

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[8] https://www.legislation.gov.uk/ukpga/2003/42/contents

so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? [9] Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. [10] Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16; [11]
- sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual

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[9] It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way. More information: here.

[10] PSHE Teaching about consent from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

[11] It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice.

harassment and/or sexual violence. [12] It may include:
- consensual and non-consensual sharing of nude and semi-nude images and/or videos.[13] As set out in [UKCIS Sharing nudes and semi-nudes: advice for](#) [education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
    - sharing of unwanted explicit content;
    - upskirting (is a criminal offence [14]);
    - sexualised online bullying;
    - unwanted sexual comments and messages, including, on social media;
    - sexual exploitation; coercion and threats.

Upskirting [15]

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

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[12] [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

[13] Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

[14] [The Voyeurism (Offences) Act 2019](#) which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

[15] Additional information can be found at [GOV.UK.](#)

Toolkits

- Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.
- Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- NSPCC - Harmful sexual behaviour framework An evidence-informed framework for children and young people displaying HSB.
- Contextual Safeguarding Network – Beyond Referrals - Schools levers for addressing HSB in schools.

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)
- Faith based abuse: National Action Plan - DfE advice
- Relationship abuse: disrespect nobody - Home Office website
- Tackling Child Sexual Abuse Strategy – Home Office policy paper
- Together we can stop child sexual abuse – HM Government campaign

Bullying

- Preventing bullying including cyberbullying - 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 - Barnardo's in partnership with HM Prison and Probation Service

Child Exploitation

- Trafficking: safeguarding children - DfE and HO guidance
- Care of unaccompanied and trafficked children – DfE statutory guidance
- Modern slavery: how to identify and support victims – HO statutory guidance

Drugs

- Drug strategy 2017 - Home Office strategy
- Information and advice on drugs - Talk to Frank website

- [Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association website

(so called) "Honour Based Abuse" including FGM and forced marriage
- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance
- [Forced marriage](#) - Forced Marriage Unit (FMU) statutory guidance
- [FGM resource pack](#) – HM Government guidance

Health and Well-being
- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing 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

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)

Violence
- [Serious violence strategy](#) - Home Office Strategy
- [Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
- [Youth Endowment Fund](#) – Home Office
- [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](#)