Durham County Council, DurhamLearn Safeguarding Policy (Including Prevent and Online Safety)

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Reviser - Kerry Nicholls

Approver - Helen Radcliffe

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The policy is reviewed on an annual basis as a minimum

Contents

1. Introduction

DurhamLearn strives to adopt the highest possible standards to ensure the safety and welfare of all learners and staff.

It is the responsibility of everyone within DurhamLearn to record and report any concerns they have immediately.

Whatever your role, if you see, hear or know something that concerns you, and suspect that anyone is at risk of being harmed or abused, you must immediately report what you have seen, heard or know.

Doing nothing is not an option.

While it is not possible to ensure that learners would never come to harm, the adoption of this policy, associated guidelines and code of conduct aims to facilitate the management of risk associated with the duty to protect staff and learners.

2. DurhamLearn Safeguarding Policy Statement

The DurhamLearn Safeguarding Policy applies to all staff, governance including the DurhamLearn partnership, volunteers and providers (including sub-contractors) who come into contact with young people, adults at risk, work-based learners and subcontracted learners. The policy is available to learners and members of the public upon request.

It has been developed in accordance with the Durham Safeguarding Children Partnership (DSCP) internal procedures for Durham County Council (DCC) take account of guidance issued by the Department for children, schools and families. DurhamLearn is committed to providing the best and safest learning environment possible so that learners can succeed, and staff and volunteers can feel safe and secure. This Policy seeks to ensure that:

- children, young people and 'Adults at Risk' are protected from harm and abuse
- staff and volunteers know what to do if they are worried or have concerns
- everyone is aware of their responsibilities for safeguarding
- learners and staff feel safe

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

- The Children Act 1989
- The Children Act 2004
- Working Together to Safeguard Children 2018 (updated July 2022)
- Keeping Children Safe in Education 2022
- What to do if you are worried a child is being abused 2015
- Protection of Freedoms Act 2012
- Care Act 2014

- Children & Social Work Act 2017
- Keeping Learners Safe 2015
- Safeguarding Children: Working Together Under the Children Act 2004
- Prevent Duty Guidance 2015 (updated April 2021)
- Modern Slavery Act 2015.

All learners could potentially be at risk.

This policy should not be used to discourage learning activities and it supports the engagement of a diverse range of learners.

This policy provides a framework that ensures staff, volunteers, sub-contractors and visitors protect all learners and keep them safe when within the care of DurhamLearn.

Reference to other relevant DCC policies is in Appendix 2

3. DurhamLearn – The Management of Safeguarding

The governance of Durham Learn (Adult Learning Service Partnership - ALSP) and the Senior Leadership Team will continue to have a strategic responsibility to the services safeguarding arrangements and must have regard to the Keeping Children Safe in Education guidance (Sept 2022), ensuring policies, procedures and training in the service are effective and comply with the law at all times.

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

We will immediately refer a person, if there are concerns about their welfare, possible abuse or neglect to the appropriate agency where they reside. A Safeguarding Investigation Form (**Appendix 1)** will also be completed and sent to the Designated Safeguarding Lead (DSL) immediately and a written record of the referral will be forwarded to the relevant external agencies (where appropriate) within 24 hours of the disclosure.

The DSL will also ensure that:
- Written records about a child/young person or adult at risk are retained securely on the Safeguarding Monitoring Database.
- All such records will be stored confidentially on a secure network. This will be monitored and managed by the DSL.
- Ensure that all staff (including sub-contractors/employers) receive regular updates on child protection, adults at risk and safeguarding, and that they receive refresher training as required.

The DSL, alongside a Deputy DSLs and Designated Safeguarding Officers act as team and ensure:

- they are the first point of contact for all staff and volunteers to go to for advice if they are concerned about children, young persons and/or 'Adults at Risk';
- they have a higher level of safeguarding training and knowledge than the other staff within the organisation;
- safeguarding policy and procedures are kept up to date and regularly reviewed;
- adherence to safe recruitment procedures for new staff members, and support their induction;
- assess information from staff regarding concerns about children, young people and/or 'Adults at Risk', make decisions about whether staff concerns are sufficient enough to notify First Contact or whether other courses of action are more appropriate;
- concerns are logged and stored securely;
- for the promotion of a safe environment for children, young people and/or 'Adults at Risk';
- they know the contact details of relevant statutory agencies e.g., Durham Safeguarding Children Partnership and the Local Authority Designated Officer (LADO) for allegations against staff, Durham Constabulary for Prevent, anti-radicalisation issues etc
- that staff are aware of this policy and the associated procedures, identifying any appropriate training that staff may require
- that adequate staff training referred to in section 9 is provided and taken up and compliance is monitored and accurately recorded on an ongoing basis.

It is not the responsibility of the Designated Safeguarding Team to decide whether children, young people and/or 'Adults at Risk' have been abused or not, that is the responsibility of investigative statutory agencies such as DCSP, SAB or the police.

However, keeping children, young people and/or 'Adults at Risk' safe is everybody's business. Staff must ensure they have the knowledge to identify Safeguarding Issues, who to go to, and how to report any concerns they may have about children, young people and/or 'Adults at Risk' being harmed or at risk of being harmed.

Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead and team are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding Lead or team will communicate any vulnerabilities known by the service to any police officer who wishes to speak to a learner about an offence they may suspect. This communication will be recorded on SIFs.

If, having been informed of the vulnerabilities, the Designated Safeguarding Lead (or team) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person, where there are grounds to suspect of an offence, must be cautioned:

1 before being questioned about an offence

2 or asked further questions, if the answers they provide are grounds for suspicion, or when the questions are put to them, they fail or refuse to answer.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

1. The parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.

2. A social worker of a local authority

3. Failing these, some other responsible adult aged 18 or over who is not:

    a. a police officer;

    b. employed by the police;

    c. under the direction or control of the Chief Officer of a police force; or

    d. a person who provides services under contractual arrangements (but without being employed by the Chief Officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.

https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

4. Learners and Apprentices in the Workplace

All employers will be expected to work collaboratively with DurhamLearn to ensure that all learners remain safe; this will include appropriate DurhamLearn staff undertaking rigorous risk assessments of the workplace. A Statement of Principles for Work Placement Providers (**Appendix 3**) has been aligned to DurhamLearn Policies and associated Procedures for safeguarding all learners or apprentices following their learning programmes. Where an employer does not have defined Child Protection Policies and Procedures DurhamLearn expects that they will affirm their commitment to safeguarding learners or apprentices by signing up to this Statement of Principles.

(A child is legally deemed to be any young person up to and including the age of eighteen. For the purpose of this Statement of Principles it also refers to young adults over eighteen who remain vulnerable or at risk). This includes apprentices.

DurhamLearn will brief all learners including apprentices at induction to brief all learners or apprentices on information sharing, how to access the safeguarding policy and issues of child protection prior to commencing their work placement and advise them to report appropriately any concerns encountered in that environment.

Evidence of this briefing will be a signed and dated induction checklist with the control measures box completed to show:

● Discuss limits of confidentiality

● How to access the safeguarding learners or apprentices and promoting welfare of the policy

● Discuss issues of child protection at their work placement/programme.

In line with its Equal & Diversity Policy, DurhamLearn recognises that all learners or apprentices regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harm or abuse.

Statement of Principles includes:

- Supervision,
- Behaviour and Relationships,
- Environment,
- Use of Social Networking Sites by adults who work with children and young people,
- Physical contact,
- Alcohol/Substance Abuse,
- Travel,
- Disqualification.

5. Responsibilities of Sub-Contractors

The responsibilities outlined throughout this policy apply equally to DurhamLearn internal staff and sub-contractors.

All sub-contractors will have their own Designated Safeguarding Lead and will continue to report in line with their own procedures. All concerns raised by DurhamLearn learners must be also reported to the DurhamLearn DSL on an ongoing basis and reviewed on a monthly basis, to ensure consistent monitoring of concerns is in place. This will be done through a secure mail server Egress Switch.

All sub-contractors will have their policies audited by DurhamLearn. This process reflects recent national guidance in relation to the management of sub-contractors and the need for robust safeguarding arrangements.

All training records for safeguarding/prevent for all sub-contractors' staff must be forwarded to the DSL DurhamLearn, which will be inputted onto the SCR and monitored on a monthly basis on the performance toolkit.

All staff that are subject to safer recruitment and require a DBS check. Sub-Contractors will ensure that the DurhamLearn DSL has sighted their certificate before commencement of teaching.

All existing and new provision will continue to be monitored through the performance toolkits which look at five key areas and form part of the overall DurhamLearn quality monitoring and assurance process. One of the key areas in the toolkit is Safeguarding, Health and Safety, and the Wellbeing of Learners. Each month sub-contractors are RAG rated against the five key areas mentioned above, with the Safeguarding section particularly checking that H&S risk assessments are being carried out at delivery venues, that delivery staff have valid DBS certificates in place and that they have carried out mandatory training around Safeguarding and Prevent and that any safeguarding concerns are being reported to DurhamLearn as well as being handled appropriately. Toolkits are moderated monthly and any issues regarding feedback in relation to Safeguarding concerns (including reporting a nil return), will be escalated and reported on to help ensure a full oversight of safeguarding is available. In addition to this Safeguarding and Prevent Reviews will take place with each subcontractor to ensure all statutory requirements are being met throughout the academic year.

6. Definition of Safeguarding

In relation to children and young people, safeguarding and promoting their welfare is defined in 'Working together to safeguard children' as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18. Any person up to the age of 25 with a current Educational Health and Care Plan in place is treated as a child for the purposes of safeguarding and child protection legislation.

Definition of an 'Adult at risk' (Vulnerable Adult)

An adult at risk or vulnerable adult is defined as a person 'that has needs for care and support (whether or not the LA is meeting any of those needs) AND is experiencing, or at risk of, abuse or neglect; AND as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect' (The Care Act, Department of Health, 2015).

Safeguarding action may be needed to protect children, young people and adults from:

- neglect
- physical abuse
- sexual abuse
- sexual harassment
- emotional abuse
- child on child abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- radicalisation and/or extremist behaviour
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- the impact of new technologies on sexual behaviour, for example sexting
- teenage relationship abuse
- substance misuse
- issues that may be specific to a local area or population, for example gang activity and youth violence
- domestic violence
- female genital mutilation
- forced marriage
- fabricated or induced illness
- consensual and non-consensual sharing of nude and semi-nude images and/or videos
- poor parenting, particularly in relation to babies and young children
- County Lines **(Appendix 5)**

more details that pose a risk to children, young people and Adults at Risk see **(Appendix 4)**

Safeguarding is not just about protecting children, young people and/or 'Adults at Risk', from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:

- children's and learners' health and safety and well-being including mental health
- risk assessments of individuals, activities, resources and facilities
- the use of reasonable force

- meeting the needs of children and learners with medical conditions
- providing first aid
- educational visits (including the necessary considerations for the type of trips and visits, in terms of staffing ratios, overnight stays etc.)
- intimate care and emotional well-being
- online safety and associated issues
- appropriate arrangements to ensure children's and learners' security, considering the local context.

It is important that we understand that safeguarding is not implicit to children only, the need to ensure effective safeguarding also extends to any adult at risk, who may be vulnerable through a variety of actions, inadequate policies and procedures, and failures to act.

Safeguarding of both children and vulnerable adults is of paramount importance and DurhamLearn seeks to ensure that a safe learning environment is available to all learners.

Low Level concerns – KCSIE 2022

For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child/young person that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards students that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and 'Appropriate and inappropriate behaviour' of staff working in the service.

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child/young person.

This threshold is defined as accusations that an adult has:

• Behaved in a way that has harmed a child or may have harmed a child.

• Possibly committed a criminal offence against, or related to, a child.

• Behaved towards a child in a way that indicates they may pose a risk of harm to children.

• Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of our service.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the service understands that many serious safeguarding concerns, e.g., child sexual abuse, often begin with low-level concerns, e.g., being overly friendly with young people. The service will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

DurhamLearn Contact with Children and Young People

Within family programmes, children and young people attend lessons alongside their parents/carers. There are also young people in mainstream learning programmes and in some supported learning programmes. These guidance notes will ensure those children and young people are also protected from abuse.

7. Safeguarding children and Adults from being drawn into or supporting terrorism

All FE providers have a duty to protect children and adults from the risks of extremism and radicalisation, a role which is underpinned by the Counter-Terrorism and Security Act (2015) *"to have due regard to the need to prevent people from being drawn into terrorism."*

DurhamLearn seeks to protect adults, children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Incels, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements. This policy and training detailed in **section 9** will help inform and support those staff working with vulnerable groups to identify potential concerns and outline the process for referral.

DurhamLearn has a statutory duty to safeguard learners to keep them both safe and within the law and commits to:

- Promoting British Values including mutual respect for those with different faiths and beliefs, the rule of law, democracy and individual liberties which enhance social cohesion
- Encouraging open debate in a forum that is safe so learners have a voice
- Embedding this aspect of safeguarding within all policies and curriculum plans to ensure DurhamLearn have an inclusive and flexible curriculum which promotes equality and diversity
- Challenge the concept of terrorism, extremism and the threat faced from those who promote these views
- Providing training and informing staff of new developments to ensure staff, volunteers and learners are aware of their roles and responsibilities and that DurhamLearn has a zero-tolerance approach to bullying, harassment, hate crime and discrimination
- Conducting risk assessments and actions plans with termly reviews or if the threat to the UK changes. (Appendix 8)

There is no specific terrorist threat to County Durham and Darlington (Durham Constabulary 2021). However, terrorism remains a real and serious threat to us all. Terrorist and violent extremism activity aims to damage community relations, undermine the values we share and create divisions. A system of threat level as been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical – an attack is expected imminently
- Severe – an attack is highly likely

- Substantial – an attack is a strong possibility
- Moderate – an attack is possible but not likely
- Low – an attack is unlikely

The current threat level from international terrorism in the UK is Substantial which means there is a strong possibility of a terrorist attack

Our Aim

DurhamLearn values freedom of speech and the expansion of beliefs/ideology as a fundamental right that underpins our society's values. Both learners and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Risk

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make adults, children and young people vulnerable to future manipulation and exploitation. DurhamLearn is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

Risk Reduction

The Management Team and the DSL will assess the level of risk within the Service and put actions in place to reduce that risk. Risk assessment may include consideration of the use of learning venues by external agencies, curriculum offer, provision specifically targeting vulnerable groups, disclosed safeguarding cases, and other issues specific to the Service's profile, community and philosophy.

Definitions

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremism leading to terrorism (**Appendix 6**).
- **Extremism** is defined by Government in the prevent strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in the definition of extremism is calls for the death of members of our armed forces. (**Appendix 6**).
- **Terrorism** is defined by Government as *"The use of violence in order to accomplish political, religious or social objectives".* Terrorism is a criminal act that influences an

audience beyond the immediate victim. Effectiveness is not the act itself but the impact on Government and the public.

- **British Values**

  The fundamentals of British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs."
  (Prevent Duty Guidance, HM Government, Dec 2014)

- **Channel**

  Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. (**Appendix 7**)

Durham's Referral Pathway
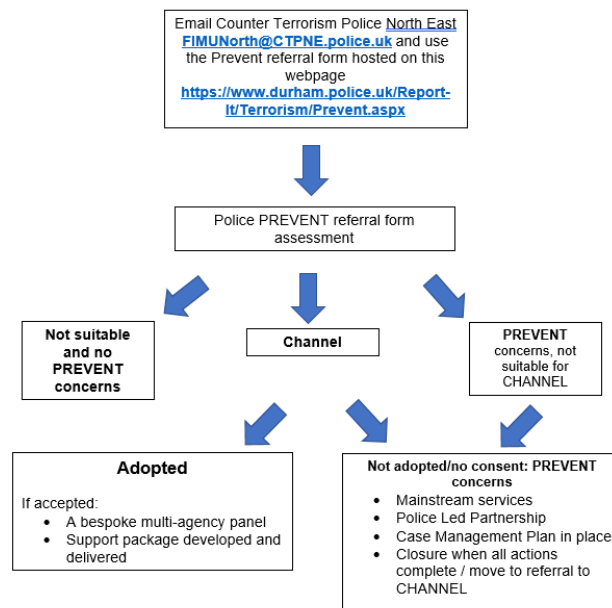
Staff Responsibilities

- Undertake training/refresher on Prevent Duty on an annual basis
- Be aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Lead.
- Report concerns where these arise to the Safeguarding Team by completing the Prevent referral form (DurhamLearn 0022)
- Promote learner understanding of Prevent duty.

- Exemplify the fundamentals of British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for these with difference faiths and beliefs" within your professional practice
- Challenge extremism.

DurhamLearn recognises that it has a key role, working in partnership, to address the many challenges faced by County Durham residents to improve outcomes. The service responds with a broad curriculum offer which helps learners to improve their skills, confidence and employability and contributes to a range of positive outcomes including improvements in health and well-being, engaged and active citizens, family and community cohesion. Staff are encouraged and supported to use every opportunity to make sure that learners respect and reinforce shared values whilst creating space for open debate.

8. Online Safety

Online Safety is providing our learners with information which enables them to use our IT systems safely, in accordance with the law and DurhamLearn policies.

What dangers may learners be exposed to online?

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

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

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

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

Our online safety duty:

DurhamLearn has a duty to safeguard learners to keep them both safe and within the law and commits to:

- have suitable internet filtering systems in place where we are providing internet access to learners

- educating all learners using IT as part of their class in safe use of the internet
- providing training and information for staff
- embedding this aspect of safeguarding in all policies and where appropriate curriculum plans

Responsibilities of Staff/Sub-Contractors

Responsibilities include the need to:

- undertake corporate training in online safety
- all staff/sub-contractors should have read, understood and accepted the Staff Acceptable Use Agreement
- be aware of when it is appropriate to refer concerns about learners or colleagues to their line manager or the DSL
- report concerns where they arise
- refrain from making negative comments about learners, DurhamLearn and DCC on blogs or social networking sites. These could be considered gross misconduct.
- educate learners in keeping safe online. Whilst regulation and technical solutions (such as filtering systems) are important, they must be balanced with educating learners to take a responsible approach. The education of learners in Online Safety is an essential part of using technology in classes. Staff should act as a good role model in their own use of ICT.
- educate learners on keeping within the law online (copyright, libel).
- act as a good role model in their own use of IT.
- those in appropriate roles (tutors/programme leads) to monitor learners' internet use in class; comply with procedures for reporting any unsuitable material that is found on Internet searches. Where practicable staff should pre-check sites and any possible searches.
- where learners are able to freely search the Internet such as in any Open Access areas, staff should be vigilant in monitoring the content of websites in case there is any unsuitable material.
- staff should be aware of the potential for cyber-bullying in their sessions where malicious messages, eg through the use of forums on the VLE (MOODLE/ CANVAS etc) and social networking sites, or via internal class emails or text messages on mobile phones etc, which can cause hurt or distress. Ensure Moodle forums and chats are monitored.

Responsibilities of Learners

The provision of ICT resources and facilities are a privilege, not a right. Learners are encouraged to access various technologies in sessions, private study and in the completion of assignments and independent research and are therefore expected to follow the services Acceptable Use Policy (AUP). They should fully participate in Online Safety activities and report any suspected misuse to a member of staff. Learners are made aware of their responsibilities within the induction to the programme.

Learners and Staff are expected to:

- Behave in a safe and responsible manner

- Treat equipment with respect

- Use USB/flash memory key(s) only for service purposes

- Be polite and not use e-mail, social media or blogs etc to make negative comments, bully or insult others

- Use the resources only for educational purposes

Learners and staff are expected not to:

- Waste resources including Internet and printers

- Eat or drink near ICT facilities

- Use someone else's login details or share your own

- Have any inappropriate files (e.g., copyrighted or indecent material)

- Attempt to circumvent or "hack" any systems

- Use inappropriate or unacceptable language

- Reveal their personal details or passwords

- Visit websites that are offensive in any way

- Use chat rooms or newsgroups. Apart from DurhamLearn's Canvas site

- Do anything that could damage the reputation of the service

- Download anything inappropriate or install any programs

Breaching these Rules may lead to:

- Withdrawal from the Service ICT facilities

- Temporary or permanent prevention of access to the relevant pages on the Internet

- Limited or disabled rights where systems are relevant.

- Appropriate disciplinary action. In the case of learners of this Service, the Service's Code of Conduct may be invoked.

- Users should note that breaches of the provisions set out in these Rules may lead to criminal or civil prosecution.

Responding to issues

It is important that any incidents are dealt with as soon as possible in a proportionate manner and that members of the service community are aware those incidents have been dealt with.

Any concerns around the misuse of ICT must follow the referral process within this policy where there is a potential threat to another learner, vulnerable person or member of staff. Any suspected misuse must be reported to the DurhamLearn's Safeguarding Lead and then an appropriate course of action will be agreed.

Where it is suspected that any misuse might have taken place by a relevant member of staff (both internal and external) will be investigated by the designated person of the Safeguarding, Health and Safety Group and depending on the nature of the misuse appropriate action may be invoked which could include Durham County Council's disciplinary procedure or termination of contract. Where an allegation has been made against a learner an investigation will take place by the designated persons of the Safeguarding, Health and Safety Group. The outcome of the investigation will decide what will be the appropriate course of action and depending on the nature of the misuse the learner could be suspended from classes until the investigation is complete. The leaner code of conduct procedure will be invoked should the allegation be found to be true, and the sanction will depend on the seriousness of the misuse and whether it was accidental or deliberate, a first-time offence, thoughtless or malicious e.g., intended to cause harm to others. Sanctions could involve the learner having ICT access removed for a period of time or in very serious cases, exclusion. Where there is a potential legal issue the Strategic Lead for Progression and Learning will decide on the need for involvement of outside agencies including the police, together with the designated persons and Senior Management team in line with our Safeguarding and other policies.

DCC Public Wi-Fi Network

Access to the Durham County Council's public Wi-Fi Network may be available in some premises and where this is available to all teaching and non-teaching staff (including learners, volunteers, suppliers, contractors and temporary staff) use of this provision is governed by the Service's Online Safety and Acceptable Use Guidance and by logging onto the network the user is deemed to have agreed to abide by Durham County Council's Acceptable Use Guidance.

All users utilising the public wireless connection should be aware of and agree to conditions of use including, but not limited to, the following:

- The Service assumes no responsibility for the safety of equipment or device configurations, security, or data files resulting from connection to the Service's public wireless network or the Internet, nor liability for any damages to hardware, software or data, howsoever caused.
- Public wireless access is provided as a free service on an "as is" basis with no guarantee of service.
- Users are responsible for setting up their own equipment to access the Public wireless network. A guide is available to help users connect to the Public wireless network.
- Staff cannot assume any responsibility for personal hardware configurations, security or changes to data files resulting from connection to the Public wireless network. It is recommended that users make a backup copy of any settings before configuring their equipment for use on the Public wireless network.

- The Public wireless network encrypts your data when you log on to the network only. For an additional level of security, we recommend only using https (SSL) websites when using passwords or making online payments.

- Use of the Public wireless internet connection is undertaken at the user's own risk. The wireless network protects users against basic malware/botnet/phishing protection; however, it is the responsibility of the user to protect their wireless devices through use of up-to-date virus protection, personal firewall and any other suitable measures.

- The Public wireless network may be subject to periodic maintenance and unforeseen downtime.

- Printing access is not available via the Public wireless network. If the user desires to print, they will have to make their own suitable alternative arrangements.

- Any attempt to circumvent Service procedures or any unauthorised attempt to access or manipulate Service equipment or networks, may result in permanent disconnection from the Public wireless network and further disciplinary action being taken.

9. The Referral Process

The following '5 R' process MUST be followed by all DurhamLearn staff:
- Recognise the signs of abuse
- Respond and react accordingly
- Record the facts of the disclosure
- Report the disclosure to the DSL (or Deputy/Safeguarding Officers) immediately. All SIFs or Prevent referral form must be forwarded to the DSL within 24 hours
- Refer (to the emergency services or Social Services or through the Channel process) in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to the DSL (or Deputy/Safeguarding Officers) immediately. All SIFs or Prevent referral forms must be forwarded to the DSL within 24 hours.

a. Recognise
Signs of abuse can be recognised as differences to the individual's usual behaviour or observed from a change in their physical appearance as mentioned below:
• Physical – this could include a lack of personal hygiene, self-harm, substance or drug abuse, noticeable signs of bruising or flinching when being touched, development of a speech disorder or learning difficulty that cannot be attributed to a physical or psychological cause.
• Behavioural – this could include sudden changes in a person's character, including lack of confidence, low self-esteem, becoming withdrawn, aggressive or angry for no reason, becoming anxious or tearful.

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

b. Respond

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

• Stay calm and listen carefully to what is being said

• Reassure the person that they have done the right thing by telling you, but not that everything will be okay; sometimes things get worse before they get better

• Find an appropriate early opportunity to explain that it is likely the information will need to be shared with others, but that this will be on a need-to-know basis

• Allow the person to continue at their own pace – asking questions for clarification only; try to ask, 'Tell me', 'Explain to me', 'Describe to me', and avoid leading questions

• Explain what you will do next and with whom the information will be shared

• Do not delay in discussing your concerns with the appropriate staff.

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

• Call an ambulance or a GP if someone needs medical attention

• Call the emergency services/police if a crime is taking place or has taken place

• Inform the DSL immediately

• Separate the alleged perpetrator and victim – but only if it is safe to do so.

Any violence by a learner or member of staff (including employer staff) must be reported through DurhamLearn's internal notification process.

If you are suspicious but no disclosure has taken place:

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

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

• Contact your Line Manager and DSL (or Deputy/Safeguarding Officers)

• Follow the guidelines in the 'Confidential reporting code' policy (**Appendix 11**)

• Do not question the person making the allegation or investigate the matter yourself.

Information sharing

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

When sharing information, remember:

• The Data Protection Act (2018) is not a barrier to sharing information

• Be open and honest

• Seek advice

• Share with informed consent where appropriate (there may be some circumstances where seeking consent, including parental consent, is not required)

• Consider safety and well-being

• Ensure that information sharing is appropriate and secure

• Keep a record.

c. Record

A Safeguarding Investigation Form (SIF) MUST be completed.

Where a SIF is not readily available, please ensure that the following information is noted:

• Your details

• Name of those involved

• Date of incident(s)/disclosure/suspicion

• Details of incident(s)/disclosure/suspicion

• Background information

• Actions taken.

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

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

d. Report

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

e. Refer

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

This will include the following:

• Any referrals to first contact - 03000 267 979 (children/adult services) or through the Channel process (first contact - 03000 267 979 and copied to special branch - HQspecialbranch@durham.pnn.police.uk)

• Where there is disagreement between members of staff about the need to make a referral

• Concerns about a young person subject to a Child Protection Order should be relayed to the keyworker immediately, in the absence of a key worker, the procedure below should be followed.

Learners Aged 18 Years or Over

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

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

10.   Alleged Abuse by Staff members

DurhamLearn procedure should be used in respect of all cases in which it is alleged or suspected that a member of staff, carer or volunteer has:

●   behaved in a way that has harmed a child/adult or may have harmed a child/adult.

●   possibly committed a criminal offence against or related to a child/adult; or

●   behaved towards a child/adult or children/adults in a way that indicates s/he is unsuitable to work with children/adults

●   Adults should understand what behaviours may call into question their suitability to continue to work with children, young people and adults.

Reference: Safer Working Practice for Adults who Work with Children DCSF 2019

Concern about Colleagues (Alleged abuse by Staff members)

The abuse of a learner or apprentice by a fellow member of staff can be a particularly difficult and potentially damaging matter to deal with. If there are concerns regarding a colleague staff **MUST** be prepared to report these

1.   Any concerns about a colleague must be raised immediately with the DSL.

2.   Depending on the nature of the incident the DSL and Senior Manager – Durham Learn Manager will refer the concerns to the Local Authority Designated Officer (LADO) in the first instance for further advice and guidance.

3.   If further action is to be taken against the staff member concerned the DSL and Senior Manager will refer to Durham County Councils Personnel Policies, Procedures and Protocols

4.   Managers **must not** inform the member of staff who is the subject of a concern or undertake their own enquiries as this issue may involve DSCP and the Police.

All allegations or suspicions of abuse of children/adults in Durham, or of conduct raising concerns about the suitability of an individual to work with children/adults, by a professional, staff member, or volunteer should be taken seriously and treated in accordance with these procedures. All organisations that provide services for children must have a procedure for handling such allegations, which is consistent with these procedures.

These procedures apply to allegations or suspicions of abuse or concerns about suitability to work with children and young people arising from within or outside their professional role. They apply to members of staff, carers, or volunteers across the childcare workforce (henceforth referred to as "staff" for the purposes of this procedure). In the case of the reporting of historical abuse the principles of these procedures apply; and the allegation should be immediately referred to Durham County Council LADO on 03000 268835 for the information to be considered.

The Process for Reporting

1. Applies to allegations or suspicions about a member of staff from within or outside the work role

2. To be reported by the DSL

3. All allegations must also be reported to the Local Authority - who are responsible for overseeing and monitoring all such cases

4. The DSL & DCC will work together to ensure that appropriate and timely decisions are made whilst retaining independence

5. The purpose of the consultation process is to decide whether the suspicion or allegation is within the scope of these procedures

6. If - following consultation - it is decided that the suspicion or allegation is not within the scope of these procedures or a police investigation is needed the DCC will liaise with the Senior Manager and advise on the next steps.

An allegation or suspicion of abuse of a child/adult by a member of staff will potentially start three different strands of enquiry:

● enquiries and assessment by Children's Services under the inter-agency procedures, which are now revised in the context of 'Working Together to Safeguard Children' (2018);

● enquiries and assessment by Safeguarding Adults inter-agency procedures, which are now revised in the context of 'No Secrets' 2000 linked to the **Safeguarding Vulnerable Groups Act** (SVGA) 2006 and The Care Act 2014.

● a Police investigation of a possible criminal offence;

● investigation under the relevant organisational procedures e.g. disciplinary procedures, within which the possibility of suspension would need to be considered

DurhamLearn safeguarding policy and procedures are in place for dealing with allegations or suspicions against staff and are compatible with these procedures, 'Working Together to Safeguard Children' and 'The Care Act 2014'. It is essential that the common facts of the alleged abuse are applied independently to each of the three strands of enquiry. The Designated Safeguarding and Prevent Lead (DSL) is able to offer support to all staff to understand what to

do if they receive an allegation against another member of staff or they themselves have concerns about the behaviour of another member of staff.

11. Training and Support

DurhamLearn works closely with the Durham Safeguarding Children Partnership (DSCP), Safeguarding Adults Board (SAB) and Durham County Council Workforce Development team who regularly deliver children's and adults safeguarding programmes. Staff will undertake mandatory training in this area. All staff will receive basic child protection/safeguarding training every 3 years and the Designated Leads will receive the appropriate level of training which is also renewable every two years.

Training activities will be recorded for staff will be monitored. Where a staff member has not met the training requirements, managers will be responsible for ascertaining the reason why, ensuring compliance is met at the earliest opportunity. Failure to meet the training requirements of DurhamLearn may result in disciplinary action being taken against the employee/s responsible in accordance with the DurhamLearn disciplinary procedure.

Where necessary, staff will receive supplementary training to ensure that they are able to fully implement this policy.

New members of staff receive a thorough safeguarding induction and safeguarding training, or where they can demonstrate they have completed the same standard of training recently, then they would be exempt though they would still need to be trained in the reporting methodology and expectations of DurhamLearn. Induction training will cover preventative action, roles and responsibilities as well as reporting mechanisms.

Regular safeguarding updates are available to ensure that any updates or developments are disseminated to staff, so they remain current. Staff will also have access to the DSCP and SAB websites.

Training will include, but will not be restricted to:

- Abuse
- Basic Child Protection Procedures & Adults at Risk
- Bullying
- Grooming
- E-Safety
- Prevent, Radicalisation & British Values
- Risk Assessment
- Confidential Reporting Code (Whistle Blowing)
- Staff Code of Conduct

Training will be updated at least every three years for all staff and in addition safeguarding leads. This has been built into the Safeguarding Action Plan and recorded on the SCR

12. Safety in the Learning Environment

DurhamLearn will ensure that all learners are aware of our safeguarding procedure and receive a copy of our 'Learner Handbook' that outlines the safeguarding staff contact details. Learners will all receive a thorough induction that explores safeguarding, including Prevent and what they need to do to report occurrences.

Where appropriate, Risk Assessments will be completed and approved by the DSL. Learners and staff need to be involved in the risk assessment process and this should be reviewed at the start of every session. Learners must be informed of any potential risks. Risk Assessments are completed in partnership with external agencies which include Durham Multi-Agency Safeguarding Hub (MASH), DSCP and Multi-agency public protection arrangements (MAPPA). These are stored centrally within a protected file and monitored on an ongoing basis by the DSL. Risk Assessments may include:

• Where it is known that a learner has a difficulty or disability that might impact on their learning a Risk Assessment should be completed on the venue, activity and the learners. Such Risk Assessments will be held with the course/class register.

• A Personal Emergency Evacuation Plan (PEEP) must also be completed where a learner is identified as having a difficulty or disability that might impact on their egress in cases of emergency, ensuring that means of escape in case of fire and associated fire safety measures provided for all people who may be in a building are both adequate and reasonable. This will need to consider the circumstances of each particular case.

• Staff engaged in off site and lone working arrangements must be familiar with the Lone Working Policy and adhere to its requirements. The Lone Working Policy is based on a thorough appraisal of the risks and how to mitigate them. [Further information relating to Lone Working is provided at **Appendix 10**].

Delivery occurs in many venues. It should not be assumed that fire evacuation and first aid policies are the same in every venue. All staff should always make themselves and the learners aware at the beginning of every session;

• **First Aid** - who is first aid qualified and where the first aid box is located

• **The Fire evacuation procedures** - What to do in the event of a fire, including the need to leave by the nearest available fire exit and location of assembly point and inform learners if there is likely to be a practice fire alarm

For all other risks, staff are responsible for making the learners aware that what they are doing is inappropriate and unacceptable.

It is important that the Health and Safety Team are informed about any incident immediately. It is extremely important that all information is received and acted upon immediately. All incidents and complaints received relating to the health, safety and wellbeing of learners and staff will be acted upon, recorded and stored for future reference.

Incidents should be recorded on an Incident Report Form as soon as reasonably practicable; forms are located electronically on the DurhamLearn network.

Note: Further information relating to health and safety and safe working practices can be located in the Council's Health and Safety policy located on the DCC intranet or within the Employer Handbook.

13. External Speakers/Visitors

If any member of staff wishes to invite an external speaker into any of the DurhamLearn delivery sessions, they must inform the DSL and complete and submit External Speaker/Guest Safeguarding Checklist (DurhamLearn 0020). Vulnerable learners are **NEVER** left unsupervised with external visitors.

All visitors **MUST** complete the DurhamLearn visitor form, in line with DurhamLearn policy.

If an agreement is made to allow external organisations or guest speakers to use the premises, appropriate checks will be made before agreeing to the contract. Usage will be monitored and in the event of any behaviour not in-keeping with the Anti-Radicalisation Prevent Policy, we will contact the police and terminate the agreement.

All visitors to DurhamLearn sites will be required to sign in and out of the venue.

Staff must ensure that where they arrange meetings with visitors to DurhamLearn premises they notify reception, ensure they are available to meet the visitor/s and accompany the visitor throughout their stay.

14. Contacts

DurhamLearn Nominated Safeguarding Officer for all referrals: 03000 266115 or DurhamLearnSafeguarding@durham.gov.uk

Durham Learn Safeguarding Team

Designated Safeguarding Lead
Kerry Nicholls

Designated Safeguarding Lead
Angela Wilson

Designated Deputy Safeguarding Lead
David Lee

Designated Safeguarding Officer SEND
Victoria Russell

Designated Safeguarding Officer & Administration Lead
Lorraine Pirt

Curriculum Prevent Lead
Susan Duggan

Designated Safeguarding Officer – Subcontractors
Becks Meszaros

Designated Safeguarding Officer Apprenticeships
Colin Ellison

Out of Hours: First Contact/Social Care Direct: 03000 267979

11.   Appendices

Appendix 1: Related policies

Further information on any issues detailed in this policy can be located in your employee handbook or looking on the Council Intranet, internet or alternatively by contacting your designated person.

- Confidential Reporting
- Council Disciplinary procedure
- Council Resolution (formally Grievance) Procedure
- Council Equality Policy
- Council Health and Safety policy
- Corporate Fraud Sanction Policy
- Code of Our Values, Behaviours and Conduct
- Disciplinary Policy
- Domestic Abuse Policy
- Drugs, Substance and Alcohol Misuse Policy
- Information Security
- Mental Wellbeing in the Workplace -Policy, Procedure and Toolkit
- Resolution Policy
- Recruitment and Selection Policy
- The Personal Use of Social Media Policy

Appendix 2: Safeguarding Learners and Apprentices

Safeguarding Learners and Apprentices
Statement of Principles for Work Placement Providers

This Statement of Principles is aligned to DurhamLearn Policies and associated Procedures for safeguarding all learners and apprentices following its learning programmes.

Where an employer does not have defined Child Protection Policies and Procedures DurhamLearn expects that they will affirm their commitment to safeguarding learner or apprentices by signing up to this Statement of Principles. (**NB** A child is legally deemed to be any young person up to and including the age of eighteen. For the purpose of this Statement of Principles it also refers to young adults over eighteen who remain at risk.

DurhamLearn will brief learners and apprentices on the issues of child protection prior to commencing their work placement and advise them to report appropriately any concerns encountered in that environment.

In line with its Equal Opportunities Policy DurhamLearn recognises that all learner or apprentices regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harm or abuse.

Supervision

Good competent supervision is an effective way of enabling the placement to be successful and reduces the risk of problems arising. Those placed immediately in charge of a learner or apprentice should be confident in dealing with young people, be mature, and capable of putting them at ease.

Behaviour and Relationships

It is important that all learners including apprentices are reassured and helped to feel comfortable and confident in their new surroundings. Relationships must remain professional and not become too familiar. Never permit 'horseplay' which may cause embarrassment or fear or could be misconstrued as 'grooming' behaviour.

Environment

All work-related meetings requiring the learner or apprentice's presence should take place at the workplace and not be held in private. There should not be contact outside of the workplace setting.

Avoid being alone in an isolated or closed environment with a learner or apprentice. Never be in a room with a learner or apprentice with the door locked and ensure that the learner or apprentice

can see their own means of escape. It is not acceptable to expose the learner or apprentice to violent or sexual images e.g., via internet or posters.

Meetings that take place with apprentices over 19 years old outside the workplace occur from time to time. On these occasions the member of staff should follow the lone-working policy. It is important that perimeters are put in place to safeguard the learner or apprentice. As a minimum: inform your line manager of where, when and who you are meeting and the expected start and finish time. Apprentice /tripartite review meetings requiring the learner or apprentice's presence should take place at the learning campus and not be held in private. There should not be contact outside of the learning campus unless previously authorised by your line manager.

Use of Social Networking Sites by adults who work with young people

All staff and/or volunteers should be aware of communication with Children and Young People (including the Use of Technology) and Social Contact, in particular:

● not to use internet or web-based or social network platforms or channels to send personal messages to a child/young person, or their parents

● have no secret social contact with children and young people or their parents

● not to give their personal contact details to children or young people, including their mobile telephone number

● understand that some communications may be called into question and need to be justified.

● To use Microsoft Teams for online learning and support of learner or apprentices.

● Staff are not to use the Zoom video conferencing platform for any purpose.

In addition, adults in school settings are advised to ensure that they enable all privacy and security settings on their social networking accounts, including the prevention of messages being sent to them as a result of an internet search. This will help prevent young people accessing and potentially misusing their personal information or making inappropriate contact.

Physical contact

There may be occasions when a supervisor needs to touch the learner or apprentice e.g. when applying first aid or when guiding a hand or arm during a task or whilst training the learner or apprentice to carry out a technical or manual operation. This should be kept to a minimum and be clearly used in a manner that is appropriate to the situation.

Alcohol/Substance Abuse

You are reminded that in law it is an offence to supply – or buy – alcohol or other substances likely to be abused for any learner or apprentice under 18. Care must be exercised in this area

when learner or apprentices are invited to e.g. out of work leaving parties, meals or staff Christmas parties.

Travel

Ensure that there is a known destination and check-in time with a third party when a learner or apprentice is travelling alone with an adult. It is a good idea to ensure the learner or apprentice(s) has a mobile phone in the event of a break down or emergency. This should be a work mobile belonging to a member of staff. A risk assessment must accompany the learner or apprentice and staff member.

Disqualification

You are reminded that you are required by law to protect children from harm and that employees are required under the Criminal Justice and Court Services Act to declare that they are disqualified/barred from working with children.

Referral where there are concerns about Child Protection following Disclosure by a learner or apprentice

Learners or apprentices may disclose confidential information to a work colleague that gives rise to concern for their physical or emotional safety. If this arises, the employee should speak to their line manager, who must then contact a member of DurhamLearn's safeguarding team on 03000 266115 or DurhamLearnSafeguarding@durham.gov.uk

Durham Learn Safeguarding Team

| Designated Safeguarding Lead Kerry Nicholls | Designated Safeguarding Lead Angela Wilson | Designated Deputy Safeguarding Lead David Lee | Designated Safeguarding Officer SEND Victoria Russell |
| Designated Safeguarding Officer & Administration Lead Lorraine Pirt | Curriculum Prevent Lead Susan Duggan | Designated Safeguarding Officer – Subcontractors Becks Meszaros | Designated Safeguarding Officer Apprenticeships Colin Ellison |

Out of Hours: First Contact/Social Care Direct: 03000 267979

A member of the Safeguarding team will complete the disclosure in line with our reporting procedure.

Workplace Name			
Employers Name & Signature		Date	
Staff Name & Signature		Date	

Appendix 4: Additional Information relating to the Safeguarding of Children, Young people and 'Adults at Risk' and Forms of Abuse

Supporting learners

Statistically children, young people and/or adults with identified needs e.g. behavioural difficulties and/or disabilities are more vulnerable to abuse. DurhamLearn staff who work in any capacity with children, young people and/or adults with profound and multiple disabilities, sensory impairment and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.

DurhamLearn recognises that learners who are abused may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may have feelings of helplessness, humiliation and some sense of self-blame.

DurhamLearn recognises that some learners actually adopt abusive behaviour and that these learners must be referred on for appropriate support and intervention.

DurhamLearn will promote a positive, supportive and secure environment and will liaise with other agencies to ensure the student is valued and has an opportunity to achieve.

The following are classified as categories of abuse:

- Physical - can include hitting, slapping, pushing, kicking, inappropriate restraint or sanction, misuse of medication or any other physical harm.

- Neglect - is a persistent or severe failure to meet the learners' basic needs and may include ignoring medical and or physical care needs, failure to provide access to appropriate health, social care, and or educational services.

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

specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

- Psychological - can include emotional abuse, threats of harm or abandonment, deprivation of contact, harassment, isolation and/or withdrawal of services of supportive networks.
- Discriminatory - includes racist and sexual abuse that is based upon the individual's disability.
- Financial - relates to the unauthorised or improper use of funds, money or resources belonging to the individual.
- Institutional - involves the collective failure of an organisation to provide an appropriate and professional service to learners (processes, attitudes and behaviour that amount to discrimination through unwitting prejudice, ignorance, thoughtlessness or stereotyping).
- Online -Information, communication and technology, the use of technology to instigate bullying or harassment or the use of social media sites spread malicious rumours or make someone feel unsafe.
- Domestic the abuse of one partner within an intimate or family relationship. It is the repeated, random and habitual use of intimidation to control a partner. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- Modern Slavery -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.

Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. **All** staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh",

"part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

    • bullying (including cyberbullying, prejudice-based and discriminatory bullying)

    • abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

    • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

    • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

    • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

    • 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

    • consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

    • upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

    • initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Nationally it has been identified that the level and risk of Child Sexual Exploitation is higher than had previously been assessed. It is important for everyone working with children and young people in County Durham to be aware of possible indicators of sexual exploitation. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship

Honour-based Violence

Honour-based violence (HBV) is the term used to refer to a collection of practices used predominantly to control the behaviour of women and girls within families or other social groups in order to protect supposed cultural and religious beliefs, values and social norms in the name of 'honour'. HBV incidents and crimes include specific types of offence, such as forced marriage (FM) and female genital mutilation (FGM), and acts which have long been criminalised, such as assault, rape and murder. We use HBV to refer to the full range of incidents and crimes which

perpetrators carry out under carry out under the guide of maintaining or protecting perceived 'honour'.

Female Genital Mutilation

Possible Indicators Include:

- A long holiday abroad or going 'home' to visit family
- An older female relative visiting the UK
- A special visitor, relative or cutter visiting from abroad
- A special occasion or ceremony to 'become a woman' or get ready for marriage
- A female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt
- Unexpected, repeated or prolonged absence
- Academic work suffering

Indicators FGM may have taken place:

A girl or woman who has had Female Genital Mutilation (FGM) may:

- Have difficulty walking, standing or sitting
- Spend longer than normal in the bathroom or toilet
- Appear withdrawn, anxious or depressed
- Have unusual behaviour often after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

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

Vulnerability Factors

The following are typical vulnerability factors in young people prior to abuse – remember though, young people from any background of any age or gender can become victims of sexual exploitation.

- Living in a chaotic or dysfunctional household (including parental substance abuse, domestic abuse, criminality etc.)
- History of abuse
- Recent bereavement or loss
- Low self-esteem or confidence
- Gang association either through relatives, peers, intimate relationships)
- Learning disabilities
- Associating with other victims of exploitation
- Uncertainty about their sexual orientation or identity (particularly if they feel unable to disclose this to their family)
- Living in residential care or homeless or living in a hostel/B&B/Foyer
- Lack of friends of the same age group

Appendix 4: One Minute Guide for Staff on County Lines

What are 'county lines'?

'County Lines' is a term used by government departments, law enforcement agencies and local authorities to describe the use of dedicated mobile phone 'lines' by gangs or criminal networks, for the sale of drugs. These are used where gangs are looking to extend their drug dealing activities into locations outside of their urban home area as the market for drugs in major cities, particularly London, Birmingham and Manchester gets swamped. Targeted areas for expansion are more rural areas and coastal towns resulting in the phrase, 'going country', used by young people. Each gang markets its own product through a telephone number or 'line' and establish new bases for the storage and distribution of drugs, and sometimes weapons. The National Crime Agency (NCA) estimated in 2017 that there were at least 283 lines originating from London alone.

Why is this a children's safeguarding issue?

'County lines' and other related activities are managed through the exploitation of vulnerable people, often children and young people, groomed and then used as 'runners' or in forced labour, transporting class A drugs, often concealed internally, weapons and money many miles from where they live. Those involved are at risk of a wide range of different harmful activities compromising their physical, sexual, and emotional health and wellbeing and being criminally exploited. They are exposed to becoming addicted to drugs themselves, getting embroiled in gang life, at risk of being stabbed, shot, or burnt by acid, going missing or trafficked, sexually exploited and used in different forms of modern slavery. The young people themselves may not actually recognise that they are being exploited or at least not until it is too late and they are unable to extricate themselves from the situation. Any challenge they may make is likely to be met with physical assault or even rape. Children are used as they are vulnerable due to their age to grooming, can go under police radar and are seen as replaceable by the gang. 'County lines' is a form of human trafficking and the children and young people that fall victim to this essentially lose their liberty and any chance of leading the lives that they are entitled to.

What children and young people are at particular risk?

'County Lines' like other forms of exploitation can affect children and young people from all demographics. Those at particular risk though are those already involved with gangs or have peers with gang affiliations, regularly go missing, are exploited in other ways e.g. child sexual exploitation. Poor attendance at school or college, or being looked after outside of a family environment, having a mental health condition or a learning disability can also increase vulnerability. Whilst children as young as 12 are being groomed by county lines gangs with promises of money, friendship, gang allegiance and respect, current data identifies that the majority of children recruited by county lines networks are males aged 15 – 17.
What they experience is being used as drug mules, being trafficked to remote areas and forced to deal drugs in dangerous situations.

What are the signs to look out for?

The signs that a child or young person is being used to run county lines are similar to those suffering from other forms of exploitation. They may frequently go missing, either for several hours or a number of days, become disengaged with education, not attend health appointments, experience drug addiction, have two or more mobile phones, and unexplained money or high-value goods. In some cases, young people may appear to be acting fairly normally, for example, obeying curfews, at the request of the gang master in order to avoid questions or detection. In some cases, families may be aware of the exploitation but take no action through fear, or because they are benefitting financially or may even be involved in the organisation of the criminal activities themselves.

What is being done about it?

There are a number of pieces of legislation that the Police can and do use to prosecute those responsible, for example, the Modern Slavery Act 2015. However those controlling the gangs running county lines are often able to remain under the radar. The Government have introduced new telecommunications restriction orders. Sharing of data in relation to missing children is helping to identify the scope of the issue and plot those children that may be at future risk. Prevention is encouraged through raising awareness through education, work with young people by voluntary and community groups offering alternative opportunities to gang involvement, as well as identifying those children and young people who are at risk due to increased vulnerability and their peer network

How can I find out more?

There are a number of different resources available which provide additional information including data, new and emerging trends, and the scale of the issue:

•	Criminal Exploitation of children and vulnerable adults: County Lines Guidance, Home Office, July 2017

•	County Lines Violence, Exploitation & Drug Supply 2017, National Briefing Report, November 2017, National Crime Agency (NCA)

The issue of county lines was discussed in the House of Commons (HoC) on 17 January 2018. A transcript of the debate is available on the Parliament website (Hansard Volume 634). There are a number of useful films on YouTube, including a news report which features case studies and a Radio 4 – File on 4 Programme – Crossing the Line – Britain's Teenage Drug Mules.

For parents or carers that are concerned that their child is being groomed to join a gang, there is guidance available from the organisation Gangfree.org

What should I do if I believe a child participating in county lines or at risk of being groomed by a gang?

Report to the Designated Lead. Report on our cause for concern document and email CYPSDurhamLearnSAFEGUARDING@durham.gov.uk

Contact the Police on 999. If the child or young person is already known to Children's Social Care, contact their Social Worker, Personal Advisor or Family Support Worker. As a 'first

responder', Children's Social Care will complete the National Referral Mechanism (NRM), a requirement in all cases identified of modern slavery

Appendix 5: Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:

   The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a "typical extremist": Those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Children and young people may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that all childcare provider staff are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:

   Identity Crisis – the child or young person is distanced from their cultural/religious heritage and experiences discomfort about their place in society;

   Personal Crisis – the child or young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

Personal Circumstances – migration; local community tensions; and events affecting the child or young person's country, or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

Unmet Aspirations – the child or young person may have perceptions of injustice; a feeling of failure; rejection of civic life;

Experiences of Criminality – this may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;

Individual Needs – child or young person may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all children or young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

7. More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Appendix 6: Guidance on Prevent and the Channel Programme

What is Prevent? Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism, in all its forms. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.

What is Channel? Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Who does Channel work with? Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

How does Channel work? Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

What does Channel support look like? Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

How will the person be involved in this process? A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Raising a concern. Typically, the DSL, would gather as much information from the member of staff raising the concern. If they believe there should be a referral to Channel, they will contact the local Police Channel Coordinator who will assess whether there is a specific risk of radicalisation. There will then be a preliminary assessment by the Local Authority Prevent Co-ordinator to decide whether the referral meets the threshold for Channel. The assessment will always follow three criteria:

a. Engagement with a group, cause or ideology
b. Intent to cause harm, and
c. Capability to cause harm.

If the assessment meets the threshold, a support package is agreed. The support may focus on a person's vulnerabilities around health, education, employment, housing, specialist mentoring, faith guidance or activities such as sport.

Who can make a referral? Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

What happens with the referral? Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

Prevent Duty Risk Assessment/Action Plan – Review/Update in August 2022

Item No	Prevent Vulnerability/Risk Area	Action taken/already in place to mitigate/address risk	Owner	Date of Update	RAG Rating
1	**Leadership** Do the following people have a good understanding of their own and institutional responsibilities in relation to the "Prevent Duty"?: • Management Group • SMT • Staff • Safeguarding team	• All staff, including SMT and Governance (ALSP) complete/refresh Corporate Prevent Training (Durham SAB) and National Home Office Prevent Training bi-annually. • ALSS Single Central Record (SCR) captures all Prevent Training completed by staff and Governors and will alert when training is within 3 months of renewal/update being required. • Any renewals due, or outstanding information, is reported via Curriculum Area Performance Toolkits so all Programme Leads can follow up required information with curriculum teams. • Non curriculum line managers receive separate updates for their staff. • New Designated Safeguarding Lead (DSL) for the Service has now had WRAP Train the Trainer training and will be facilitating further updates with all staff in September 2021 during CPD week along with the Prevent Lead (TC). • Key information provided to ALSP as part of Safeguarding updates at termly meetings, along with Prevent Newsletters issued by Regional Prevent Co-ordinator. • Safeguarding/Prevent dedicated team now on Microsoft Teams where useful resources/updates are provided to all staff by Prevent Lead and safeguarding team. • ALSS Safeguarding Induction reviewed and updated to include self-study mandatory requirements on induction to the Service here Safeguarding Induction	AW (DSL)/ Safeguarding Team/ all staff/ management team/ governors	August 2022	Green

Item No	Prevent Vulnerability/Risk Area	Action taken/already in place to mitigate/address risk	Owner	Date of Update	RAG Rating
		• Prevent Awareness/Training clearly identified in mandatory training and required to be updated bi-annually here SG Mandatory Training • Safeguarding Survey carried out with all staff to gauge confidence and knowledge levels regarding Safeguarding and Prevent. Results are considered to plan further CPD/awareness raising. • Safeguarding Policy is in place and reviewed bi-annually to include key updates on relevant national policy and local arrangements. This sets out everyone's role and responsibilities for Safeguarding and Prevent and is approved by Management Team and ALSP (Governing Body).			

2	**Partnership**			
	• Is there active engagement from the institution's Governors, SMT, managers and leaders? • Does the institution have an identified single point of contact (SPOC) in relation to Prevent? • Does the institution engage with the BIS, Local Authority Police Prevent Leads and engage with local Prevent Boards/Steering Groups at Strategic and Operational level?	• <u>Currently considering the need for appointed Safeguarding/Prevent lead on ALSP. Consulting with HMI lead to determine expectations of Ofsted etc and looking at other ways of involving expert/professional input and challenge to ALSS processes.</u> • Safeguarding and Prevent Update is on every ALSP meeting agenda where key information is shared, eg Prevent Newsletter, updates in training requirements and any corresponding safeguarding concerns/referrals. • ALSP includes a current Ofsted HMI who contributes useful information to our policies/procedures. • An Annual Report on Safeguarding and Prevent is produced each year and considered/approved by the ALSP (Governing Body). • DSL is single point of contact for Prevent. However, we have also benefited from having a nominated Prevent Lead from the curriculum team who supports the safeguarding team to fulfil its responsibilities, especially with a view to curriculum delivery. Curriculum Manager is being asked to consider and nominate someone. • The Safeguarding Team also have a nominated SPOC for Employers/Work Based Provision who takes responsibility for ensuring all partners involved in our apprenticeship provision are aware of their responsibilities with regards Prevent and are able to safeguard the learners whilst carrying out their training. • DSL attends Silver Contest Board Meeting alongside DCC's Lead Officer for Prevent. • DSL and safeguarding officer also attends bi-monthly regional DSL meeting which includes DFE Prevent Lead. Feedback is provided to management team and updates provided to all staff as appropriate.	Linda Bailey/ David Lee AW (DSL) David Lee/Donna Ross	August 2022 August 2022 August 2022	Amber

2	**Partnership (Continued)**	• Links are in place with the Local Authority Prevent Lead (AP) where information is shared and we work together on common issues such as IT policy and notifications system. • A Prevent Review Group has been meeting since June 2021 to take forward the required actions regarding ICT Policy/Security and Incident Management/Lockdown Procedures. Expert advice has been sought at points also with the DFE Prevent Lead attending two of the meetings to date.	Linda Bailey/AW (DSL)	August 2022	Amber
3	**Staff Training** Do all staff have sufficient knowledge and confidence to: • exemplify fundamental British Values in their management, teaching and through general behaviours in the institution (Within FE) • understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism • have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response • have front line staff got the tools and knowledge to impart knowledge of Prevent in a contextualised way? • do staff understand the referral pathway/how to make a referral/raise their concerns?	• Safeguarding Channel now includes resources area where updates are provided for staff to use as part of the curriculum delivery • SHEDS and Hot Topics briefings circulated to all staff and sub-contractors termly. • Prevent Newsletter produced by FE Prevent Lead is shared with all staff and they are encouraged to review/use local information as part of curriculum where appropriate to add context to the agenda • Part of induction to service includes completion of Safeguarding Adults Board Level 1 Prevent Awareness Training and the National training provided by the Home Office on Prevent • All staff then complete Safeguarding Adults Board Level 1 Prevent Awareness Training and the National training provided by the Home Office on Prevent, every 2 years • SCR tracks completion of training completed and prompts when renewals/refreshes are due via Sub-Contractor and Programme Area performance toolkits	DL/AW (DSL)	August 2022	Amber

Staff Training (Continued)	• DSL has now completed the WRAP Train the Trainer course.			Amber
	• DCC Values and Code of Conduct cover treating all groups and individuals with respect, value their opinions and beliefs and behave in an appropriate manner so exemplify fundamental British Values			
	• The safeguarding referral process is documented and made available to all staff via induction to the service and available to all within the Teams channel or Safeguarding/Prevent. Documented process would mean any concerns about an individual who may be vulnerable to being drawn into terrorism would be referred immediately to the DSL/safeguarding team.			
	• Process has been proved to be effective due to recent Prevent referral that was made.			
	• CPD activity in September 2021 included a session on Safeguarding and Prevent specifically. The County Durham Prevent Referral flowchart was covered but staff were reminded that any Prevent concerns need to come through to the Safeguarding Team to consider if a Prevent referral is needed, ie they wouldn't make a referral directly themselves.			
	• Continuous improvement required in curriculum delivery of fundamental British Values/Prevent.			
	• Safeguarding Survey carried out with all staff to gauge confidence and knowledge levels regarding Safeguarding and Prevent. Results are considered to plan further CPD/awareness raising. Evaluation of results currently being carried out.			
	WRAP Training planned for all staff in February 2022. Andy Bailey has provided dates for his availability so staff availability will now be checked and training booked in.			

| 4 | **Welfare and pastoral support**

• Are there adequate arrangements and resources in place to provide pastoral care and support as required by the institution?
• Are their adequate monitoring arrangements to ensure that this support is effective and supports the institutions welfare and equality policies? | • Pastoral log developed to record early identified additional needs and support/interventions in SEND programme area. This will be considered for further rollout of this process where appropriate in curriculum areas.
• Learner induction includes initial assessment of awareness of Safeguarding, Prevent and fundamental British Values and appropriate support provided at start of programme.
• Additional Learning Support Co-ordinator in place.
• Learning Delivery Assistants in place.
• Apprenticeship provision includes reviews between learner, tutor and employer.
• Employer Handbook includes roles and responsibilities for learners, tutors and employer with regards Safeguarding and Prevent/fundamental British Values.
• Learner Handbook outlines our commitment to Safeguarding, Prevent and fundamental British Values with learners and provides information for learners to be able to raise concerns.
• Prevent and fundamental British Values Posters are available for posting in classrooms. Currently being reviewed using best practice shared by Northumberland LA.
• End of course evaluation checks learner views on how safe they felt on their course.
• Learner Voice process captures feedback on their experiences | Curriculum Manager/ Programme Leads | August 2022 | Amber |

5	**Speakers and Events** • Is there an effective policy/framework for managing speaker requests? • Is it well communicated to staff/students and complied with? • Who conducts the due diligence checks on a proposed speaker?/What's the escalation procedure?	• External Speaker form in place as part of service/paperwork process. • It is communicated to staff/students however a review of the effectiveness of this process would be beneficial. • DSL reviews all external speaker proposals however as noted above, a review and refresh of the process is needed. • Safeguarding Policy to be reviewed in this regard also to ensure the overarching principles are covered.	AW (DSL)/ Curriculum Manager	August 2022	Amber

6	**Safety Online**				
	• Does the institution have a policy relating to the use of IT and does it contain a specific reference and inclusion of the Prevent Duty? • Does the institution employ filtering/firewall systems to prevent staff/students/visitors from accessing extremist websites and material? • Does this also include the use of using their own devices via Wi-Fi? • Does the system alert to serious and/or repeated breaches or attempted breaches of the policy? • Who receives alerts/what type of alerts are they a single point of failure if absent etc?	• Personal Information and Security Policy (PISP) has now been updated and includes reference to our duties with regards Prevent. • Filtering system is now active and notification system in place when the DCC Network/Wi-Fi is being used by staff. Notifications will go to DCC Prevent Lead (AP) and other members of the newly formed Moderation Group. • There are standalone laptops which are not connected to DCC – these cannot be tracked currently for usage. • Communication has gone out to Tier 4 managers regarding the new process/system in advance of procedures being formally established. • Categories included in notification system to be streamlined and more information will be provided on each by Steve Hodgson, Strategic Manager, Technical/Resources. • Moderation Group, to include HR and Safeguarding colleagues, has been established and formal procedures for notifications agreed, the group will continue to meet to review notifications, consider sites to be blocked, effectiveness/appropriateness of blocking and notification process. • Further consultation has taken place with other experts regarding search engines and public Wi-Fi usage as not completely resolved yet. • As a result a cloud-based filtering system needs to be purchased to provide the same level of security as above to learners, and to staff when they are working at home and using own Wi-Fi connections. CMT Paper has been produced for consideration and Prevent Review Group will continue to monitor and progress this through with system planned to be purchased in 2022/23 financial year.	Linda Bailey	August 2022		Amber

7	**Learner Knowledge** • Do learners have sufficient knowledge of British Values, Prevent and Radicalisation and understand what Radicalisation is • Can learner identify when they or a fellow student might be being radicalised • Do Students know how to report a Prevent Issue	• Learners receive an induction which includes Safeguarding, Prevent and fundamental British Values. • Learners have an initial assessment on their knowledge of these issues and appropriate support put in place at the start of their course. • Curriculum Plans allow for planning of fundamental British Values within lessons and how this will be assessed/measured. • Ongoing reviews and end of course evaluations cover learners knowledge/experience of fundamental British Values/Prevent. • Assessment of 2021/22 learner evaluation responses and learner voice activity identifies we still have some work to do on enabling learners to retain the information they have been provided/taught within their course. Full analysis provided in Annual Report. • Posters and cards available with what to do should a learner have concerns about themselves or someone else in the class but need to consider this further in the context of remote delivery. • Currently considering the use of an online system/platform for raising issues, eg Toot Toot. Without this type of software, need to look at the implications if there is a data breach. • Canvas learning system has 'button' for asking for support or help/advice with anything that is concerning a learner. • Learner Handbook covers key topics around Safeguarding and Prevent and next review of the handbook will include specific details on how to report issues or concerns. • Annual Report for 2021/22 will capture and report against Learner Voice outcomes and identify areas for development of process/working practices.	AW (DSL)/ ALSS Manager/Curriculum Manager/ Programme Leads	August 2022	Amber

8	**Premises/Venue Security** • Are there effective arrangements in place to manage access to the premises by visitors and non-students/staff? • Is there a policy covering the distribution (including electronic) of leaflets or other publicising material?	• All staff have ID badges that are worn at all times. • Registers are kept for all classes so learners are identified and attendance monitored accordingly. • Safeguarding Policy review is to include a review of distribution of materials/leaflets specifically.	DSL	August 2022	Amber
10	**Safeguarding** • Is protection against the risk of radicalisation and extremism included within Safeguarding and other relevant policies? • Do safeguarding staff receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism? • Does the institution utilise Channel as a support mechanism in cases of radicalisation and extremism? • Does the institution have a policy regarding referral to Channel identifying a recognised pathway and threshold for referral?	• Safeguarding Policy includes specific sections in relation to Radicalisation, definitions of Extremism, staff responsibilities for challenging extremist behaviour and indicators of vulnerabilities that could lead to radicalisation. • Safeguarding Team do Prevent Awareness Training both in terms of local safeguarding board training and national Home Office training on a bi-annual basis. • Home Office Channel Training (online) will be required to be completed by Safeguarding Team in 2021/22. • DSL has had recent experience of the Channel/Prevent referral process having received a Prevent Concern. A Prevent Referral was forwarded to local Policing team and cross-team process was put in place to support learner with understanding their thoughts/actions although the threshold for a Channel referral was not reached. • The County Durham Prevent Referral flowchart has been shared with staff and is available in the Safeguarding channel on Teams but any Prevent concern would be managed by the Safeguarding Team not individual members of staff.	AW (DSL)	August 2022	Green

| 11 | **Communications**

• Is the institution Prevent Lead and their role widely known across the institution?
• Are staff and students made aware of the Prevent Duty, current risks and appropriate activities in this area?
• Do learners and staff have Prevent understanding which is more than surface learning?
• Are there information sharing protocols in place to facilitate information sharing with Prevent partners? | • Prevent Newsletter, Hot Topics and SHEDS are issued on a regular basis.
• Need to consider further how to use CTLP to best effect considering its sensitive nature/information.
• Curriculum Plans have a requirement for how Prevent and British Values are covered in curriculum delivery.
• Thematic review as part of Quality Improvement to be implemented in 2021/22. This will include being considered/observed via OTLs, walkthroughs, Curriculum Plan checks and learner evaluation etc.
• The reported case in 2020/21 shows staff understanding of the Prevent referral process and awareness of the signs to look for.
• Staff Safeguarding Survey analysis will provide information about staff confidence levels on this.
• Social Care Direct and First Contact
• Sharing of relevant information from Silver Contest Board with Management Team and staff as appropriate.
• Sharing of information via regional DSL meeting which is attended by DFE Prevent Lead.
• Safeguarding Policy outlines actions around Prevent referrals. | | | Amber |

12	**Incident Management** • Does the institution have a critical incident management plan which is capable of dealing with terrorist related issues? • Is a suitably trained and informed person identified to lead on the response to such an incident? • Does the Communications/Media department understand the nature of such an incident and the response that may be required? • Does the institution have effective arrangements in place to identify and respond to tensions on or off campus/sites which might impact upon staff, learner and/or public safety? • Are effective arrangements in place to ensure that staff and learners are appraised of tensions and provide advice where appropriate?	• CMT Paper has been prepared proposing that a policy will be developed by April 2022 with approval being sought in June 2022, with full training and compliance by individual buildings to be in place and tested by November 2023.	Linda Bailey	August 2022	Red
13	**Staff and Volunteers** • Does awareness training extend to sub-contracted staff and volunteers?	• Sub-contractors have contractual requirements in place regarding Safeguarding and Prevent with local and national Prevent Awareness Training being required bi-annually. • Sub-contractors are also required to produce Prevent Self-Assessments and share these with ALSS. • All relevant information is recorded on the sub-contractor single central record (SCR)	AW (DSL)/Becks Meszaros (DSO for sub-contractors)	August 2022	Amber

14	**Freedom of Expression** • Does the institution have a Freedom of Speech/Expression policy? • Does this policy recognise and incorporate the risks associated with radicalisation and extremism? • Is the need to protect vulnerable individuals covered within this policy?	• Code of Our Values, Behaviours and Conduct, Council Resolution (formally Grievance) Procedure, Confidential Reporting Code, Personal Use of social media. • Learner Handbook • External Speaker (Safeguarding Policy)	David Lee, AW	August 2022	Green
15	**Subcontracting** • Do all Subcontractors have up-to-date Prevent Policies and Procedures? • Do all Subcontractors know the process for referring people who are displaying the indicators of radicalisation? • Do subcontractors have effective anti-radicalisation methodologies in place within the learning environment? • Do learners and staff have Prevent understanding which is more than surface learning?	• It is a contractual requirement that sub-contractors have Prevent policies and procedures in place, either as standalone policies or as part of their Safeguarding Policy overall. This is checked at due diligence. • All sub-contractors are contractually required to carry out a Prevent Self-Assessment annually and action plan for any improvements/developments needed. This is checked/monitored via Monthly Performance Toolkits. • Sub-contractors, as part of the Safeguarding Reporting a Concern process, know to refer any instances of potential radicalisation to the Safeguarding Team at DCC. • Fundamental British Values within the curriculum as a standard, making learners aware etc, posters, prevent training. • CPs require planning of fundamental British Values and Prevent within curriculum delivery, but considering a standardised video/presentation as part of minimum induction? • Sub-contractors carry out bi-annual training as part of their contractual requirements both in terms of Prevent Awareness developed by the local safeguarding board, and national training from the Home Office.	AW (DSL)/Becks Meszaros (DSO for sub-contractors)	August 2022	Amber

Appendix 8 – A Note on Safer Recruitment

Experience shows the importance of organisations that provide services to children, young people and/or 'Adults at Risk' operating recruitment and selection procedures and other human resources (HR) management processes that help deter, reject, or identify people who might abuse children, young people and/or ''Adults at Risk'', or are otherwise unsuited to work with them. Making safeguarding and promoting the welfare of children, young people and/or 'Adults at Risk' an integral factor in HR management is an essential part of creating safe environments for children, young people and/or 'Adults at Risk'.

Safer practice in recruitment means thinking about and including issues to do with child protection and safeguarding and promoting the welfare of children, young people and/or 'Adults at Risk' at every stage of the process. It starts with the process of planning the recruitment exercise and, where the post is advertised, ensuring that the advertisement makes clear the organisation's commitment to safeguarding and promoting the welfare of children, young people and/or 'Adults at Risk'. It also requires a consistent and thorough process of obtaining, collating, analysing, and evaluating information from and about applicants. Main elements of the process include:

• ensuring the job description refers to the responsibility for safeguarding and promoting the welfare of children;

• ensuring that the person specification includes specific reference to suitability to work with children;

• obtaining and scrutinising comprehensive information from applicants, and taking up and satisfactorily resolving any discrepancies or anomalies;

• obtaining independent professional and character references that answer specific questions to help assess an applicant's a face-to-face interview that explores the candidate's suitability to work with children as well as his or her suitability for the post;

• verifying the successful applicant's identity;

• verifying that the successful applicant has any academic or vocational qualifications claimed;

• checking his or her previous employment history and experience;

• verifying that s/he has the health and physical capacity for the job;

• the mandatory DBS check or, where applicable, Enhanced Check.

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with at risk groups, including children.

DBS are responsible for:

❖ processing requests for criminal records checks

- ❖ deciding whether it is appropriate for a person to be placed on or removed from a barred list
- ❖ placing or removing people from the DBS children's barred list and adults' barred list for England, Wales and Northern Ireland

DBS search police records and, in relevant cases, barred list information, and then issue a DBS certificate to the applicant and employer to help them make an informed recruitment decision.

Information released on DBS certificates can be extremely sensitive and personal. Therefore a code of practice for recipients of DBS certificates has been developed to ensure that any information they contain is handled fairly and used properly.

Only staff who have completed Durham County Council's recruitment and selection training will be responsible for interviewing and making decisions regarding DBS checks.

Information provided by DBS to DurhamLearn will be used to make final recruitment decisions, where appropriate, to the suitability of a potential candidate in relation to pending position/role.

All front-line staff will undergo a DBS Enhanced Check, Checked for barring and the DBS update service.

The Disqualification by Association requirements will be applied where appropriate.

Central Records

DurhamLearn will maintain a central record system of staff who work with children, young people and/or 'Adults at Risk' as part of their duties. The information that is recorded, in respect of staff members, is whether the following checks have been carried out, or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate;
- a prohibition from teaching check;
- further checks on people living or working outside the UK;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.
- Register with the DBS update service
- **Further information can be found at:**
- www.gov.uk/government/organisations/disclosure-and-barring-service/about
- www.safenetwork.org.uk/getting_started/Pages/Why_does_safeguarding_matter.aspx
- DCC Vetting Policy (DBS & NPPV), December 2017

Appendix 9 – Information relating to Lone Working

Lone working - where staff will be working separately from others outside normal hours of work, in venues without close or direct supervision, or on site assessing, they must ensure the following:

- They have a contact number for a person who can be contacted in case of an emergency and a contact number at the venue and that this is recorded on the register.
- Their direct line manager is aware of the delivery.
- Staff and learners are aware of the safest way to leave the building to ensure the health, safety and wellbeing of all parties.
- A risk assessment is completed in the register. Staff must inform managers if the risk is identified as high.
- If there is an immediate risk of violence removes self and others who may be at risk.
- Contact the emergency contact number from the register.
- If this is not practical or the issue is serious contact emergency services on 999.

Further Information is available in Durham County Council Lone Working Policy.

Appendix 10 - Disclosure by Staff - Whistleblowing (Confidential Reporting Code)

Durham County Council has effective systems in place to ensure that its employees provide the best levels of service and act appropriately.

The confidential reporting code is designed to give employees the chance to draw attention to concerns about wrong or unacceptable practice. It is not about telling tales on colleagues but aims to ensure that work is carried out honestly and well.

All concerns will be recorded and investigated promptly. Concerns will, so far as is possible, remain confidential and those raising them will be treated fairly by the Council. For further information please refer to 'Confidential Reporting Code' located on the Council intranet.

The official name for whistleblowing is 'making a disclosure in the public interest'; however it is much more commonly called 'blowing the whistle' or 'whistleblowing'. It means that if you believe there is a wrongdoing in your workplace (e.g. somebody may be committing a criminal offence) you can report this by following the correct processes, and your employment rights are protected.

Whistleblowing

Employees are often the first to realise that there may be something seriously wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Council. They may also fear harassment or victimisation. In these circumstances employees may feel that it is easier to ignore the concern rather than report it.

This policy has been written to take account of the Public Interest Disclosure Act 1998, which protects workers making disclosures about certain matters of concern, where those disclosures are made in accordance with the Act's provisions.

For further information relating to this policy, please refer to The Confidential Reporting Code for Employees, located on the Council intranet.

Appendix 11 – Further Contact Details

- Young people with concerns can also phone: Childline: 0800 1111.
  - ➢ If you are worried or have concerns about the safety of a child, you cannot make a referral from this website. Members of the public can phone the council (in confidence) to report a concern on the number Childline number above.
- If you have been affected by any of the issues in this policy or you know someone who has, please contact our Designated Person on 03000 266115 or email DurhamLearn@durham.gov.uk
- Or if the person is in immediate danger contact the police on 999 or Durham Police on 0345 6060365.
- For incidents affecting young people (0-18) contact First Contact 03000 267979 (24-hour service) or Childline 0800 1111.
- For incidents affecting adults (18+) contact First Contact 03000 267979 (24-hour service)
- For incidents of Domestic Violence Contact the Safer Families Team on 03000 202525 or National Women's Aid 08-82000 247.
- If you are a young person with concerns about your own safety (or one of your friends) and you do not want to talk to the police or a social worker you can also call Childline on 0800 1111. This is a free 24-hour number offering advice and support. You can also visit the Childline website.
- Members of the public can also contact the NSPCC by text message on 88858 to report concerns about a child. This service is free and anonymous the NSPCC aim to respond within three hours. In an emergency you should always contact the Police (on 999) and/or Children's Services. For non-emergencies you can contact Northumbria Police on 03456 043 043.