

Safeguarding Policy

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Purpose

Safeguarding and child protection are about promoting the welfare of children is defined for the purposes of this guidance as: protecting children and vulnerable adults from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children and adults to have the best outcomes.

DBC Training has a legal duty to address safeguarding and child protection and fulfil the Prevent Duty Agenda. A number of pieces of legislation and guidance documents provide the legal and guidance framework within which we work including;

[Children Act 1989](#),
[Children Act 2004](#),
[Keeping Children Safe in Education 2021](#)
[Education and Training \(Welfare of Children\) Act 2021](#)
[Safeguarding Vulnerable Groups Act 2006](#)
[Prevent Duty Guidance 2021](#)

DBC will also ensure to create a safe and secure environment in which learners are enabled to develop and flourish.

Ofsted, the inspection and regulatory body that covers the school and further education sectors, has a keen and growing focus on ensuring that providers discharge their duties relating to safeguarding.

Scope

This policy applies to the DBC Training centres, employees, learners, partners and employers. Children refers to learners under the age of 18. A **vulnerable adult** is a person

over 18 who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation.

The policy applies to situations where a child or vulnerable adult is suffering significant harm, or is likely to do so, as action should be taken to protect that child or vulnerable adult. Action should also be taken to promote the welfare of a child/vulnerable adult in need of additional support, even if they are not suffering harm or are at immediate risk.

DBC Training recognises that threats may originate from a range of different extremist groups. Any form of extremist ideology, radicalisation or terrorist activity is also covered by this policy.

Policy statement

DBC Training recognises its legal and moral duty to promote the wellbeing and development of all learners and staff and protect them from harm. For that reason, safeguarding and child protection measures are integral to many aspects of the safe and supportive learning experience we strive to create.

While the whole learning community benefits from this holistic approach to safeguarding, we take a rigorous stance on the protection of learners who are identified in safeguarding and child protection related legislation and statutory guidance, namely those who are under 18 or who are vulnerable adults.

Safeguarding Contact Details

Designated Safeguarding Lead

Name: Sue Colebourne

Email: sue.colebourne@dbc-training.co.uk

Senior Lead for Safeguarding (Board Member)

Name: Frances Drew (Skills & Quality Director)

Email: frances@dbc-training.co.uk

Managing Director

Name: Kerry Bentley (Executive Chair)

Email: kerry@dbc-training.co.uk

Email: safeguarding@dbc-training.co.uk

NSPCC Helpline

0808 800 5000

Commitment to the policy

DBC Training will ensure staff are committed to our safeguarding policy through a cycle of training and development, every member of staff will commit to promoting learner safety and welfare every day.

The DBC board will ensure that all staff are fully compliant and share [Keeping Children Safe in Education \(KCSIE\) 2021](#), ensuring that all staff read and understand Part 1 as a minimum requirement.

All key stakeholders will be communicated with regularly outlining safeguarding responsibility, the DBC website contains our up-to-date safeguarding policy and contact information for the safeguarding team is provided for all key stake holders to be able to access further information upon request.

Our commitment

- We believe that a child or vulnerable adult should never experience abuse of any kind.
- We promote the welfare of all children, young people and vulnerable adults and to keep them safe.
- We have a responsibility to promote the welfare of all children and young people, to keep them safe and we are committed to practice in a way that protects them.
- We will protect learners from radicalisation and extremism, by responding swiftly where learners are vulnerable to these issues.
- We protect children, young people and vulnerable adults who receive our services. This includes the children of adults who use our services and any siblings of learners.
- We will provide staff and volunteers with regular updates and annual training on Safeguarding and Prevent.
- Record and check the details of all visitors to all our premises

Environment

In relation to the environment we will:

- Provide a physical and emotional environment that is healthy, safe and secure, in which learners can thrive;
- Ensure that all staff members of DBC Training are identifiable by the wearing of lanyards and identity badges appropriate to their role;
- Raise awareness of issues relating to health and safety within the organisation.

Staff Recruitment & Training

In relation to staff recruitment we:

- have the required **Safer Recruitment Policy** in place which includes Disclosure & Barring Service (DBS) and relevant checks to ensure suitability to the role.
- Implement safe recruitment procedures when employing staff and maintain accurate records of these checks on a single central record;
- Ensure every staff member has an enhanced DBS check;
- Implement the following verification for all recruits:
 - Identity;
 - Right to work in the UK;
 - Professional qualifications.
- Obtain 2 references from previous employers, one of which must be the most recent employer;
- Ensure a risk assessment is completed for staff awaiting a DBS check with appropriate supervision outlined within the assessment (as outlined in the **Safer Recruitment** policy);
- Comply with our legal duty by following the [ISA Referral Guidance 2010](#);

- Ensure that at least one interviewing manager on an interview panel has undertaken Safer Recruitment training and that all managers complete Safer Recruitment training within one year of commencement.

In relation to staff training we:

- Provide appropriate training to ensure members of staff are aware of the issues of Safeguarding and the procedures to follow. This includes pre-commencing employment all staff complete the following training:
 - Home Office online Prevent training courses for awareness and referrals
 - Channel awareness course
 - The Foundation Online courses for Safeguarding and Safer Recruitment,
 - ACAS Equality & Diversity courseThis training is completed and refreshed every 12 months.
- Provide appropriate training to ensure members of staff are aware of the issues of health and safety and the procedures to follow.
- Ensure staff receive regular safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings, to provide them with the relevant skills and knowledge to safeguarding children effectively.

How we recognise and respond to safeguarding concerns

In relation to recognising and responding to concerns all staff:

- Adopt and apply safe working practices.
- Promote all aspects of safeguarding to learners so they know how to access support and advice.
- Be aware of and alert to signs and symptoms of abuse and know to whom they should report any concerns or suspicions;
- Be able to recognise when a learner is not achieving their developmental potential, or when their physical or mental health is impaired;
- Be able to recognise when a learner is displaying risky or harmful behaviour, or is being neglected or abused;
- Be able to recognise when a learner or staff reported incident may be a Safeguarding or Child Protection concern;
- Refer concerns, even if in doubt, to a designated member of staff who will refer to the appropriate authorities, so that they can investigate and take action;
- Be advised to maintain an attitude of 'it could happen here' where Safeguarding or Child Protection is concerned;
- When concerned about the welfare of a child, always act in the interests of the child;
- Be aware of the expert sources of advice on the signs of abuse and neglect. Each area's Local Safeguarding Children Board (LSCB) should be able to advise on useful material, including training options;
- Be aware of and follow the procedure for reporting a safeguarding incident and other safeguarding related procedures and guidance;
- Work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

In relation to staff with a specific safeguarding responsibility we have a:

- Nominated Designated Safeguarding Lead who provides support to staff members to carry out their safeguarding duties;
- Agreed and published clear roles and responsibilities;
- Adopted a case management approach to the identification, assessment and support of learners at risk of harm;

- Notify the appropriate agencies so that they can investigate and take any necessary action. It is not the responsibility of centre staff to investigate suspected abuse; this is a matter for Social Services, the Police and/Multi Agency Safeguarding Hub;
- Apply agreed procedures when sharing information about a learner.

DBC will seek to keep learners safe by:

- Ensure that all learners are taught about safeguarding, including online safety e.g. Weekly safeguarding email circulation of topical issues/main events in that week which is used to provide delivery staff content to embed into learning.
- All learners receive a safeguarding induction on their session of learning.
- All learners will cover relevant issues throughout their programme of learning and enrichment opportunities.
- Working with learners to equip them with the knowledge needed to safeguard themselves and each other, including risks posed by peer on peer abuse. This includes activities within their programme that promote Safeguarding concerns and issues;
- Make learners aware of Safeguarding support available on a continual and proactive basis through tutorials, events and promotional material;
- Consult with learners regarding issues relating to health and safety;
- Implement procedures for identifying and assessing the risk posed by any incoming learners who may pose a threat to others;
- Use various methods of learner engagement to regularly monitor learner perception of their safety;
- Consult learners to identify the issues that they face;
- Protect learners from radicalisation and forms of extremism leading to terrorism by:
 - Being vigilant for the signs of radicalisation and have the confidence to report their concerns
 - Encouraging free and open debate, but challenging extreme views and promoting the belief equality of opportunity and the celebration of diversity;
 - Forbidding the use of premises by extreme groups and preventing the distribution of extreme literature.
- Appointing a Designated Safeguarding Officer (DSL), and a lead board member for safeguarding
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Having a zero-tolerance approach to peer on peer abuse for all learners and staff members within DBC Training
- Developing and implementing an effective online **E-Safety** policy and related procedures
- Obtaining Cyber Essentials Plus accreditation to support online/E-Safety
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures
- Recruiting staff safely, ensuring all necessary checks are made
- Recording and storing information professionally and securely
- Sharing information about safeguarding and good practice with children, their families, staff and volunteers via leaflets, posters, group work and one-to one discussion
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, vulnerable adults, parents, families and carers appropriately
- Using our procedures to manage any allegations/concerns against staff and volunteers appropriately

- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that we provide a safe physical environment for our children, young people, vulnerable adults, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

In relation to learners missing from education we:

- Follow DBC Trainings procedures for dealing with children that go missing from education (see Appendix L), particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future;
- Ensure staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation (FGM) and forced marriage;

Third parties in relation to the use of contractors we:

- Ensure that any contractor, or any employee of the contractor, who is to work at the centre has been subject to the appropriate level of DBS check;
- Not allow a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity;
- Check the identity of contractors and their staff on arrival.

In relation to visitors we:

- Ensure all visitors sign in and out at main receptions;
- Ensure they wear a visitor lanyard at all times;
- Ensure they are accompanied by a member of DBC staff at all times

In relation to liaison and partnership with external parties we:

- Work together with the Local Safeguarding Teams and other relevant agencies;
- Refer to appropriate agencies e.g. The Police, Social Services or Local Safeguarding Children Board, Local Authority Designated Officer as necessary;
- Inform the Education and Skills Funding Agency, via the Managing Director (MD), if the organisation becomes subject of a Safeguarding enquiry.

Prevent

In relation to our responsibilities in line with the Prevent agenda we:

- Closely follow any locally agreed procedure as set out by the home office and local Authority and/or Local Authority Safeguarding Children Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation;
- Strive to eradicate the myths and assumptions that can lead to some young people becoming alienated and disempowered, especially where the narrow approaches young people may experience elsewhere may make it harder for them to challenge or question these radical influences. In DBC this will be achieved by good delivery and other personal development, behaviour and welfare topics throughout the curriculum; but also by adopting the methods outlined in the Government's guidance

and promoting fundamental British values as part of every learner's pathway programme;

- Ensure that all of our delivery approaches help our learners build resilience to extremism and give learners a positive sense of identity through the development of critical thinking skills;
- Ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it;
- Keep up-to-date with developments and good practice and keep our **Preventing Extremism and Radicalisation** Policy under review.

Definitions

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation

Child

A child is any person under 18 years of age. ([Children's Act, 1989](#))

Child protection

Child protection is the protection of children from violence, exploitation, abuse and neglect. [Article 19 of the UN Convention on the Rights of the Child](#) provides for the protection of children in and out of the home.

Designated person

A designated person is a member of staff who has responsibility for receiving and handling safeguarding and child protection concerns and has been trained to perform the role to an appropriate level.

Duty of care

This is the duty which rests upon an individual to ensure that all reasonable steps are taken to ensure the safety of a learner involved in any activity, or interaction for which that individual is responsible. Any person in charge of, or working with learners in any capacity, is considered both legally and morally to owe them a duty of care.

Early help

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged.

Extremism

The vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Safeguarding

Safeguarding is wider than Child Protection and is defined as: protecting from maltreatment preventing impairment of health or development ensuring that a person is growing up in

circumstances consistent with the provision of safe and effective care undertaking that role so as to enable optimum life chances and to enter adulthood successfully.

Safeguarding therefore covers more than the contribution made to child and adult protection in relation to individual children or adults. It also encompasses issues such as learner health and safety, bullying, and a range of other issues, e.g. Arrangements for meeting the medical needs of learners with medical conditions, providing first aid, centre security, and drug and alcohol misuse. This list is not exhaustive and there may be other safeguarding issues that arise in the centres. Safeguarding is also about being proactive and putting measures in place in advance of any contact with learners to ensure that learners are going to be kept safe.

Prevent duty

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

Radicalisation

This refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. (Revised [Prevent Duty Guidance for England and Wales](#), issued on 12th March 2015 and revised on 16th July 2015).

Restraint

A measure or condition that keeps someone or something under control.

Self-Harm

Deliberate injury to oneself, typically as a manifestation of a psychological or psychiatric disorder.

Vulnerable adult

A vulnerable adult is defined as a person ‘who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.’ (Department of Health, 2000)

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Types and signs of abuse

Abuse

may be physical, sexual or emotional abuse, or neglect.

Significant harm

Ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar learner)

Physical abuse

Actual or likely physical injury to a learner, or failure to prevent injury. This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise

causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a learner they are looking after. This form of physical harm is recognised as Fabricated or Induced Illness.

Sexual abuse

Actual or likely sexual exploitation of a learner, including prostitution. Involving forcing or enticing a learner to take part in sexual activities without their consent or understanding, this may not necessarily involve violence. The activities may involve physical contact including penetration or non-penetrative acts. For example, it may also include involving the learner looking at or being involved in the production of, pornographic material or watching sexual activities, or encouraging the victim to behave in sexually inappropriate ways. Can include grooming a vulnerable learner in preparation for abuse.

Emotional abuse

Emotional abuse is the persistent emotional ill treatment of a learner with the intent to cause severe and persistent adverse effects on the victim's emotional development. It may involve conveying to the victim that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on a learner, causing them frequently to feel frightened, or the exploitation or corruption of learners will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction. It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyber-bullying. It may include not giving the learner opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

Neglect

Neglect is the persistent failure to meet a vulnerable learner's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting a vulnerable learner from emotional harm or danger.

Peer-on-peer abuse

Peer-on-peer abuse is when a child / vulnerable adult abuses other children/vulnerable adult. Peer-on-peer abuse can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. 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 peer on peer abuse they should speak to their designated safeguarding lead. It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually 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.

Peer on peer 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 peers; 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, 11 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, 12 such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

Bullying and Harassment

Bullying can include a variety of behaviours from one individual/ group to another individual/ group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way. Please refer to Babington's Anti-Bullying Policy for further detail.

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. 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 e.g. 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 e.g. they believe they are in a genuine romantic relationship.

Cyber Bullying and E-Safety

The safe and responsible use of technology is sometimes presented as primarily a learner protection issue, but all need support to keep themselves safe online. The risks associated with the use of technology are vast and include internet, text or video messaging, email,

chatrooms, social media networking sites, etc. used to embarrass, humiliate, threaten, intimidate, or bully an individual in an attempt to gain power and control over them. Other risks include the mismanagement of personal data, risks of financial scams, identity theft, grooming and radicalisation.

Domestic Violence

Can be physical, emotional, sexual, neglect. This category also covers Forced Marriages and honour-based violence. Some learners may experience issues with drugs or alcohol to self-medicate or via dependence.

Female Genital Mutilation (FGM)

Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that females at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires staff to report where, during their professional duties, they either are informed by a female under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a female under 18 and they have no reason to believe that the act was necessary for the female's physical or mental health or for purpose with labour or birth. For the purposes of the duty, the relevant age is the female's age at the time of disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18).

Forced Marriage

One or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. When a person does not consent or is unable to assent, there is a lack of full and free consent (if they have learning disabilities or a mental health need, for example). A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the person.

Honour Based Violence (HBV)

Honour based violence (HBV) is a collection of practices used to control behaviour within the family and community in order to protect perceived cultural and religious beliefs and/or honour. Abuse can occur when perpetrators perceive that a person has shamed the family and/or community by breaking their honour code. Women are predominantly, but not exclusively, the victims, which can be distinguished from other forms of violence, as it is often committed with some degree of approval and/or collusion from family and/or community members. Men and boys can also be victims, sometimes as a consequence of their involvement in what is deemed to be an inappropriate relationship, if they are gay, or if they are believed to be supporting the victim.

HBV occurs across all cultures, nationalities, faith groups and communities. Relatives, including females, may conspire, aid, abet or participate in honour-based abuse, for what might seem a trivial transgression.

The list is not exhaustive but examples of HBV may include:

- Murder
- Unexplained death (suicide)
- Forced marriage

- Fear of forced marriage
- Controlling sexual activity
- Domestic violence (Including psychological, physical, sexual, financial or emotional abuse)
- Child abuse
- Rape
- Kidnapping
- False imprisonment
- Threats to kill
- Assault
- Harassment
- Forced abortion

Modern slavery

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

Risk to self and/or others

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

Serious Crime

Serious and organised crime includes drug trafficking, human trafficking, organised illegal immigration, child sexual exploitation, high value fraud and other financial crime, counterfeiting, organised acquisitive crime and cyber-crime.

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Sexting

This is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics' or 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender has lost control of the image and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many people are not aware that they could be committing a criminal offence under the Sexual Offences Act 2003. Any direct disclosure by a learner (male or female) will be taken very seriously. A learner who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to our attention, we will follow the

guidance as set out in the UKCCIS publication Sexting in Schools and Colleges: Responding to incidents and Safeguarding learners.

Sexual violence and sexual harassment between learners

Sexual violence and harassment can occur between two learners of any age or gender or when a group of learners sexually assaults or harasses a single learner or a group of learners. Sexual violence and sexual harassment may overlap and can occur on-line and off-line (both physical and verbal). Sexual violence includes offences under the Sexual Offences Act 2003 (rape, assault by penetration and sexual assault). Consent is defined as the ability to choose freely. Consent to sexual activity can be provided for one type of sexual activity but not for another, and it can be revoked at any time during the action and each time it takes place.

Sexual harassment is unwelcome sexual behaviour that is likely to violate a learner's dignity, intimidate, degrade, or humiliate them, and/or create a hostile, offensive, or sexualised environment. It can happen both online and offline. Sexual remarks, such as telling sexual stories; lewd remarks; sexual remarks about clothes and appearance; calling someone sexualised names; sexual "jokes" or taunting; deliberately brushing against someone; interfering with someone's clothes; or displaying pictures, photos, or drawings of a sexual nature are all examples.

Sexual harassment on the internet can occur on its own or as part of a larger pattern of sexual harassment and/or sexual assault. Non-consensual sexual image and video sharing sexualised online bullying, unwelcome sexual comments, and messages (including on social media), sexual exploitation, coercion, and threats, and upskirting are all examples. If staff have a concern about a learner or a learner makes a report to them which relates to peer-on-peer sexual violence and/or sexual harassment, they must report their concerns to the safeguarding team immediately.

Initiation/Hazing

Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

Hazing is seen in many different types of social groups, including gangs, sports teams and educational groups. The initiation rites can range from relatively benign pranks, to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct. Hazing may include physical or psychological abuse. It may also include nudity or sexual assault.

Upskirting

Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is now a specific criminal offence in England and Wales. It can take place in a range of places, e.g., British Transport Police have seen a rise of reports on public transport.

The law captures instances where the purpose of the behaviour is to obtain sexual gratification or to cause humiliation, distress, or alarm. Perpetrators will now face two years in prison with the most serious offenders being placed on the sex offenders' register. Criminalising this distressing practice aims to deter people from committing the crime.

Safeguarding and prevent roles and responsibilities

All staff, contractors and volunteers:

- Contribute to creating a safe learning for all;

- Are aware of and follow the organisation's safeguarding policies and procedures; they recognise, respond and report any concerns that may be raised about the safety and welfare of a young person or vulnerable adult.
- Follow DBCs Whistleblowing policy procedure for any concerns relating to staff behaviour or business procedure

Centre Managers and Delivery Staff:

- Ensure that the learning environment is safe and that safeguarding is embedded within teaching practice to educate learners on staying safe, building resilience and developing critical thinking skills.
- Follow DBCs Whistleblowing policy procedure for any concerns relating to staff behaviour or business procedure

Deputy Designated Safeguarding Leads:

- Have a responsibility at an operational level within the organisation, ensuring specialist safeguarding staff are supported and directed in their duties;
- Report any concerns to the Designated Safeguarding Lead
- Will always be available during centre open hours, or arrange suitable cover when this is not possible.
- Oversees the provision of resources and training for all staff.

Designated Safeguarding Lead:

- Respond to safeguarding concerns within the agreed timescales;
- Carry out assessments to determine the level of risk including low level concerns of any allegations against staff, and inform the Local Authority and other partner organisations if required;
- Advise on updates on legislation and Local Authority compliance.
- Acts as the main contact for outside agencies and the most senior 'go to' person in the organisation;
- Will always be available during centre open hours, or arrange suitable cover when this is not possible.
- Reports to the Senior Management Team;
- Oversees the provision of resources and training for all staff.

Safeguarding - Keeping You Safe Committee:

- Represents all departments, learners and DBC learners and ensures that sound arrangements for Safeguarding are in place across all these service areas;
- Steers developments; monitors and reports on compliance and impact.

Managing Director:

- has organisational responsibility for ensuring DBC Training meets its duties under Safeguarding and Prevent.

Non-Executive Director:

- Advises and guides the organisation on safeguarding and prevent issues.
- Provides challenge to the executive team to improve quality of provision in terms of safeguarding concerns.
- Ensures appropriate policies and procedures are in place in order for action to be taken in a timely manner to safeguard and promote children's welfare

Procedures and guidelines associated with the Safeguarding & Prevent policy

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Appendix A

DBS and Safeguarding Protocol

Safeguarding Training

All members of staff are required to undertake training upon induction with DBC Training. This training is designed to ensure that staff are aware of the centre procedures for reporting safeguarding or child protection concerns, wider safeguarding issues such as drug and alcohol problems, homelessness, risky behaviour and guidance on professional conduct.

The team also complete regular professional development. This is delivered by attending training provided through external organisations, using internal specialists and through visits from external speakers.

Disclosure and Barring Service (DBS) checks

DBS checks must be completed and validated by all staff at least once a year. Employees must be made aware of their obligation to inform their manager of any cautions or convictions that arise between these checks taking place.

Dealing with convictions

If a DBS is returned with details of convictions HR advice must be sought. Consideration will be given to the [Rehabilitation of Offenders Act 1974](#) and also:

- the nature, seriousness and relevance of the offence
- how long ago the offence occurred
- one-off or history of offences
- circumstances surrounding the offence
- changes in circumstances
- country in which the offence occurred
- de-criminalisation and remorse.

DBC Training undertake to discuss any matter revealed in a disclosure with the person seeking the position before a conditional offer of employment is withdrawn.

When convictions are disclosed (by the applicant or through a disclosure check), DBC Training will carry out a risk assessment (see **Safer Recruitment Policy**) and may, at their discretion, decline to select the individual for employment.

In circumstances where the appointment of a person with a serious record might give rise to criticism of the centre, the MD should be consulted before the appointment is confirmed.

Staff who have lived outside the UK

Newly appointed staff who have lived outside the United Kingdom are required to undergo the same checks as for all other staff in schools and FE providers. This includes a DBS disclosure and barred list check. In addition, the centre will seek to obtain a Certificate of Good Conduct from the relevant embassy.

Employment of ex-offenders – existing employees

All employees are required to declare to DBC Training any criminal convictions or cautions whilst they are employed by the college.

A failure to disclose such information to the centre (including spent convictions for posts where the rehabilitation of Offenders Exemption Orders applies) may lead to disciplinary action.

Employees are also encouraged to declare if they are subject of a police investigation in the UK or abroad, which may lead to one of these sanctions. The reason for this disclosure is for the centre to protect their reputation and safeguard the interests of its learners, and to provide appropriate support to the individual employee.

Supervision

If a member of staff has not received full disclosure, the relevant line manager will have discretion to make an informed decision as to whether the person will be permitted to commence employment pending the receipt of a DBS disclosure. A risk assessment must be completed in order to assist the decision-making process. In all such cases that person will be required to be supervised until the full disclosure is received.

This is to ensure that staff are not left alone with learners to minimise any risk of potentially harmful situations (or accusations). Essentially this means that a third party should be present, whether it is a member of staff or a learner.

The DBS does not define “supervision”, which has made it difficult to draw up a definition that satisfies everyone. One thing that should be clear is that supervision is not to question the competence of staff but purely to protect both learners and staff alike.

Portability

Portability refers to the re-use of a DBS check (disclosure), obtained for a position in one organisation and later used for another position in another organisation. DBC Training does not facilitate portability.

Payment for disclosure information

DBC Training requests DBS disclosures as an integral part of the recruitment process the process is facilitated by the HR function and paid via the HR budget.

Retaining information provided by the DBS

The DBS advise that ‘disclosure documents’ must be destroyed six months after they are no longer needed. The information recorded must be:

- record of receipt
- information on decisions made
- reference number
- date of issue of enhanced check.

Details of discussions with staff about criminal or other declarations must be retained on personal files.

Appendix B

Guidelines for maintaining confidentiality, information sharing and recording confidential information

Members of staff may have access to confidential information about learners in order to undertake their everyday responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a learner or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other schools/services).

Information must always be used in the best interest of learners and never to intimidate, humiliate, or embarrass the learner. Confidential information about a learner should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the learner's identity does not need to be disclosed the information should be used anonymously. In circumstances where members of staff do not need to know all the detail, this should remain the case.

There are some circumstances in which a member of staff may be expected to share information about a learner, for example when abuse is alleged or suspected. In such cases, members of staff have a duty to pass information on without delay, but only to those with designated child/adult protection responsibilities. In centre this would be the Centre Manager and/or Designated Safeguarding Lead.

If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek advice from the Designated Safeguarding Lead or the Operations Director.

The storing and processing of personal information about learners is governed by the [General Data Protection Regulation 2018](#).

Information shared outside of the European Economic Area (EEA) or shared without reason or consent constitutes a Data Breach. Should any employee discover or be responsible for a data breach; this must be reported immediately to the Data Protection Officer.

The safety, well-being and protection of learners are the paramount consideration in all decisions staff make about confidentiality. The appropriate sharing of information between centre staff is an essential element in ensuring a learner's well-being and safety.

The general rule is that staff should make clear that there are limits to confidentiality at the beginning of the conversation with the learner. These limits relate to ensuring learner's safety and well-being. The learner should be informed when confidence has to be broken for this reason and will be encouraged to do this for themselves whenever this is possible.

Any learner who wishes to disclose must be informed that the member of staff has a professional responsibility to share the relevant information about the protection of the learner with other professionals. If a learner confides in a member of staff and asks for the information to be kept secret, they must be informed that the member of staff has a responsibility to share the information with someone who can help if deemed necessary. This needs to be done with care and sensitivity and the learner needs to be reassured that the matter will only be discussed with people who need to know.

Appendix C

Reporting concerns or disclosures relating to safeguarding issues

If the safeguarding incident is a child or adult protection issue:

1. Any member of staff who either suspects, witnesses or is told of any incident of physical, emotional, sexual, financial, discriminatory or institutional abuse or neglect occurring in the centre, or to a learner, child or vulnerable adult outside the training centre environment has a duty to report this immediately to the safeguarding team.

In the rare case that none of these are available, the member of staff should report directly to the Managing Director or to Social Services/Police. Staff are aware that anyone can report a safeguarding concern to the Multi-Agency Safeguarding Hub.

2. Staff should not leave the learner, suspect or relevant witnesses alone until arrangements have been made either through the Safeguarding Team or directly with external agencies to ensure that the parties are safe and that witness evidence is not contaminated.

3. Staff should hand over any notes taken during the disclosure and submit a fully completed safeguarding incident form and submit to the Designated Safeguarding Lead as soon as is practicably possible afterwards of what they have suspected, witnessed or been told.

Staff should be aware that:

- It is not the responsibility of staff to investigate suspected cases of abuse. They are reported to Social Services, Police or Multi Agency Safeguarding Hub if necessary.
- Any questioning should be limited to the minimum necessary to seek clarification only, strictly avoiding 'leading' the person who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened. (do not ask questions like 'did he/she do x to you? Instead use TED – Tell, Explain and Describe).
- Any questioning should stop as soon as the learner has disclosed that he or she believes that something abusive has happened to him or her, or to someone else.
- They should tell the informing learner that they will now make sure that the appropriate people are brought in to follow up the disclosure.
- They should not take any action beyond that agreed in the procedures established by the centre and the local safeguarding children's board and local safeguarding adults board.
- They should never promise a learner complete confidentiality – instead they should explain that they may need to pass information to relevant staff in the centre and other professionals to help keep the learner and others safe.

Staff should:

- Make handwritten verbatim notes
- Tell the person, very early on in the discussion that you may have to share what they are telling you with someone else.
- Allow the person to speak without interruptions, accepting what is said, but do not investigate.
- Alleviate feelings of guilt and isolation, whilst passing no judgement i.e. Reassure.
- Advise that you will try to offer support, but that you must pass on the information.

- Offer additional support – for instance a centre representative, external support service or GP.
- Inform a designated member of staff immediately.
- Record and date any facts, which support the disclosure or your suspicions.
- Offer your notes to the designated person.
- Do not discuss the issue with anyone but the designated person.

Appendix D

Procedure for staff that see or are made aware of allegations made against/concerns of another member of staff, including learner disclosure and procedure for follow up

Section one: Allegations that may meet the harms threshold

This guidance should be followed where it is alleged that a member of DBC Training, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child/vulnerable adult, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child/vulnerable adult and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children/vulnerable adult; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

Members of staff who hear an allegation of abuse against another member of staff should:

- Report the matter immediately to the Designated Safeguarding Lead, a Manager or the Operations Director who will contact the Managing Director (MD).
- Any suspicion, allegation or actual abuse by a member of staff must be reported to the safeguarding executive director as soon as possible, but within 24 hours.

On being notified of any allegation of abuse involving a member of staff, the MD will:

- take such steps as are necessary to ensure the safety of the person in question and anyone else who might be at risk.
- consult with the Designated Safeguarding Lead, Operations Director and the Local Authority Designated Officer to decide whether a referral should be made under the Local Authority Designated Officer procedures.

During investigation of an alleged safeguarding incident against a member of staff by a learner(s), the learner(s) will be interviewed by a member of the Senior Management Team at a location specified by the centre and may be accompanied by a parent/carer where:

- the learner/s is under the age of 18 or is a vulnerable adult
- consent has been given by the learner(s)
- in doing so, the learner(s) would not be placed at risk of significant harm

If appropriate, the meeting may also include a member of staff or an external safeguarding/child protection professional e.g. The Local Authority Designated Officer.

When the centre makes a referral to the Local Authority Designated Officer or Multi Agency Safeguarding Hub there may ensue:

- a requirement to suspend the staff member pending investigation (without prejudice or presumption of guilt).
- an area child protection committee investigation.
- a police investigation.

DBC Training's disciplinary procedures must be clearly distinct from any investigation conducted under area Child Protection Committee procedures or by the Police. Investigations will take precedence over the institution's disciplinary proceedings and should be conducted first. Conducting concurrent internal and external investigations is not appropriate. DBC Training's responsibility is to ensure that the parties are safe and that evidence is not contaminated and made available promptly to the investigating officer.

Section Two: Concerns that do not meet the harm threshold

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child/vulnerable adult does not meet the threshold set out in section one. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working at or on behalf of DBC Training acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Members of staff who have a concern against another member of staff should:

- Report the matter immediately to the Designated Safeguarding Lead, a Manager or the Operations Director.

On being notified of any concern of abuse involving a member of staff, the Designated Safeguarding Lead:

- Record the low-level concerns should in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted.
- Consult with the Operations Director and HR department where relevant to decide on next steps.

Records of low-level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Designated Safeguarding Lead will work with the Operations Director to decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the Local Authority Designated Officer.

Appendix E

Secure storage, handling, use, retention and disposal of disclosures and disclosure information guidelines

As an organisation using the Criminal Records Bureau (DBS) disclosure service to help assess the suitability of applicants for positions of trust, the centre complies fully with the [DBS Code of Practice](#) regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information

Storage and access

Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with [section 124 of the Police Act 1997](#), disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom disclosures or disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, the centres shall not keep disclosure information for any period longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six-months, the centres will consult the DBS about this and shall give full consideration to data protection legislation and the individual's human rights before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail. If concerns have been raised about an adult's behaviour around children, you should keep the records in their personnel file either until they reach normal retirement age or for 10 years - whichever is longer (IRMS, 2016). You should keep records for the same amount of time regardless of whether the allegations were unfounded. However, if you find that allegations are malicious you should destroy the record immediately. Information should be kept for this length of time even if the person stops working or volunteering for the organisation

Disposal

Once the retention period has elapsed, the centres shall ensure that any disclosure information is immediately suitably destroyed by secure means, i.e. by shredding or pulping. While awaiting destruction, disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). The centres will not keep any photocopy or other image of the disclosure or any copy or representation of the contents of a disclosure. However, notwithstanding the above, the centres may keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which

the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

Loss of a disclosure or disclosure information

If a member of staff discovers that a disclosure or disclosure information has been lost they must inform Human Resources (HR) who will take appropriate action and inform the DBS.

Requests to reveal disclosure information to third parties

There may be circumstances when you are requested to reveal details of a disclosure to a third party, for example, in connection with legal proceedings. Such requests must be submitted to (HR) who will seek legal advice, as appropriate, and inform the DBS of any such request immediately and prior to releasing any information.

All requests to reveal disclosure information to third parties, even to Ofsted must be channelled through the Managing Director.

Subject Access Requests

Data Protection legislation allows an individual to request all information pertaining to them from an organisation; this is known as a Subject Access Request an individual is only entitled to their own personal data, and not to information relating to other people (unless they are acting on behalf of someone). All Subject Access Requests will be checked by the Data Protection Officer prior to issue, to ensure no information is released that relates to other subjects or may cause harm to the requester or other individuals.

All Subject Access Requests must be channelled through the DBC Training Operations Director or Managing Director.

Appendix F

Procedure for dealing with e-safety incidents

This procedure applies to all learners of the centres and covers all centre-related activity when a learner is in the legitimate care of a member of centre staff (for example trips, visits, placements).

The purpose of this procedure is to provide guidelines for staff for reporting e-safety incidents for example bullying through social networking sites such as Facebook.

Procedure

Following an e-safety incident, the following process applies:

1. Depending on the nature of the e-safety incident, it should be reported initially as follows:
 - if it involved a learner, it should be reported to the Designated Safeguarding Lead
 - if it involved a member of staff, it should be reported to the Designated Safeguarding Lead or Operations Director
 - If the incident involves receiving inappropriate images (including nude images) staff must not send or forward these images on to anyone, it should be immediately reported to the Designated Safeguarding Lead or Operations Director.
2. A referral of the incident may be made to an external agency such as the Police if appropriate.
3. Depending on the nature of the incident, the following steps may be undertaken for learners:
 - temporary suspension of access, caution issued
 - removal of access pending investigation
 - removal from programme
4. An investigation will always be undertaken. Depending on the nature of the incident, the following steps may be taken for staff:
 - no further action taken
 - disciplinary meeting with sanctions as appropriate
 - suspension
 - dismissal

Serious concerns or allegations against staff will always be reported to the LADO (Local Authority Designated Officer) and/or the Police.

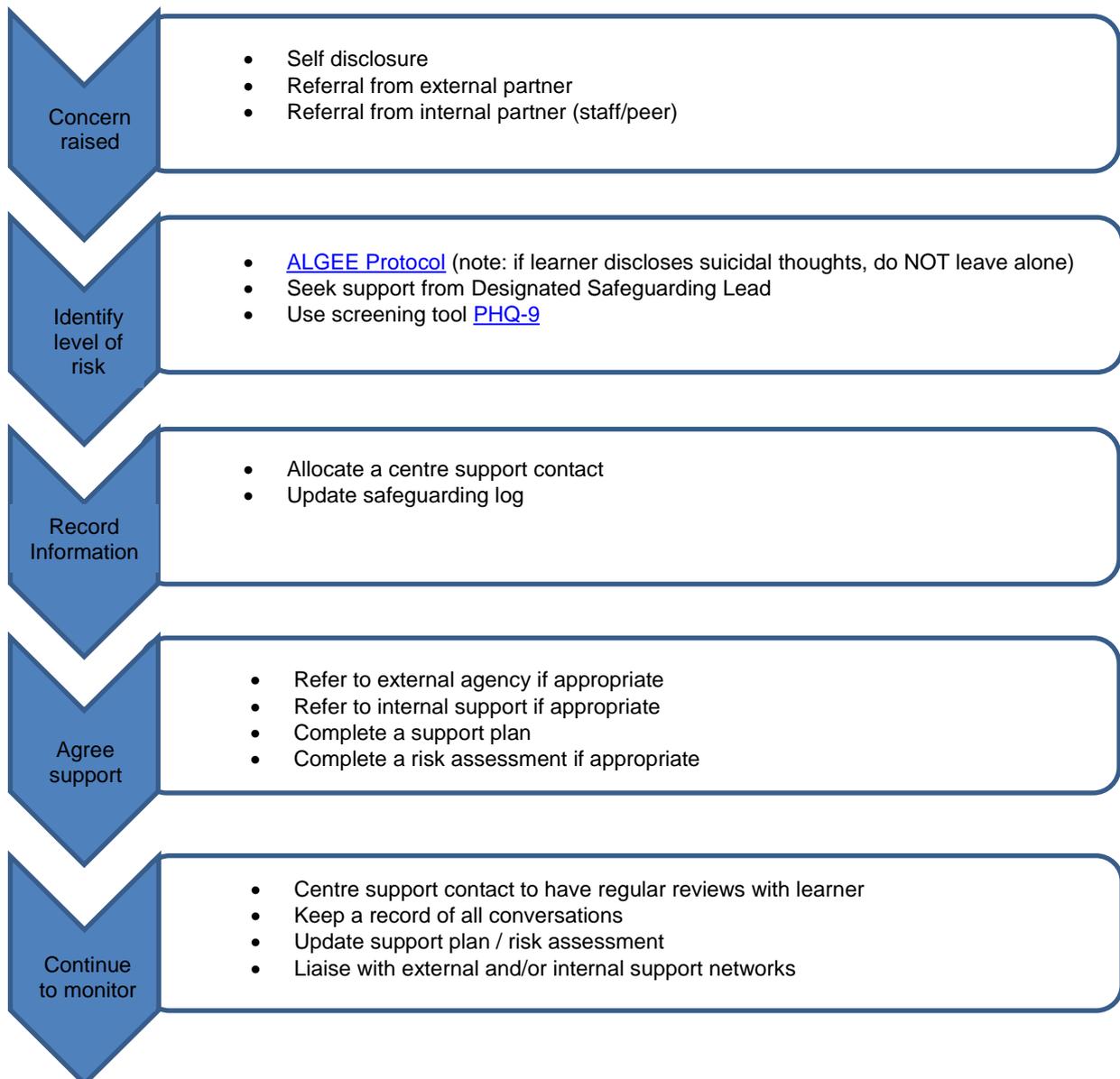
For guidance on dealing with bullying and similar issues please see the **Bullying and Harassment** Policy.

Appendix G

Advice for staff and procedures for handling actual or threatened self-harm or suicidal thoughts

This procedure applies to all learners of the centres and covers all centre-related activity when a learner is in the legitimate care of a member of centre staff (for example trips, visits, placements).

Mental Health Protocol



Appendix H

Role of designated person and procedure for handling an allegation or disclosure

Where the matter reported relates to a learner from a partner organisation the designated member of staff should make contact with the designated person of that organisation to open communications.

On receiving an allegation or disclosure of abuse, the Designated Safeguarding Lead will:

- Take steps needed to protect any learner involved from risk of immediate harm. (this may involve allocating an appropriate member of staff, as far as possible a person chosen by the learner him/herself, to stay with him or her until suitable arrangements for his/her protection are made.).
- Not interview or investigate the allegation further, but refer the matter immediately to the relevant Social Services department.
 - when making the referral you should include any information they have on the child's / vulnerable adults developmental needs, the capacity of the child's parents or carers to meet those needs and any external factors that may be undermining their capacity to parent. This information may be included in any assessment, including an early help assessment, which may have been carried out prior to a referral into local authority children's social care. Where an early help assessment has already been undertaken, it should be used to support a referral to local authority children's social care; however, this is not a prerequisite for making a referral.
- Take handwritten verbatim notes.
- Consult the Duty Social Worker/Police and follow advice about contacting parents, other staff, police, doctor or alleged perpetrator or witnesses directly. Agree with the Duty Social Worker/Police any necessary next steps in relation to:
 - i. Informing a learner's parents/guardian/next of kin (there are circumstances where it would be inappropriate to inform parents/guardians/next of kin immediately an allegation has been made).
 - ii. A medical examination or treatment for the learner (again, there are circumstances where medical evidence will be needed).
 - iii. Immediate protection that may be needed for a learner who has been the victim of abuse.
 - iv. The person who has given information about abuse, and a learner against whom an allegation has been made (each of these may now be at risk).
 - v. Informing other people at the centre (including any other member of staff) of the allegation and its investigation. Information should be shared on a strictly 'need to know' basis.
- The person who makes a referral should always follow up their concerns if they are not satisfied with the response.
- Inform the learner or person who made the initial allegation of what the next steps are to be, having agreed these with the Duty Social Worker.
- Inform the Operations Director and Designated Safeguarding Lead (if not the designated person to whom the concern has been reported) of the allegations and the action taken as above, and agree necessary further action in line with these standards.
- Take any steps for the longer term protection and support of each learner who has made allegations of abuse or neglect, or is alleged to have suffered from abuse or

neglect, taking his or her wishes into account. Ensure they are aware of the support available internally and externally and put supportive measures in place.

- Record the incident (names, date, time and content of disclosure) and create a folder on the safeguarding site of SharePoint. The report must include the name and position of the person to whom the matter is reported. Gather notes from other staff involved to hold on file.
- Feedback should be given by local authority children's social care to the referrer on the decisions taken. Where appropriate, this feedback should include the reasons why a case may not meet the statutory threshold and offer suggestions for other sources of more suitable support. Practitioners should always follow up their concerns if they are not satisfied with the local authority children's social care response and should escalate their concerns if they remain dissatisfied
- Arrange for any counselling support that may be necessary (if appropriate) for staff involved in the reporting of abuse, through HR.

Appendix I

Procedure for staff in organisations where learners are on work placement or similar

- Work-based learning staff and those working on behalf of DBC Training should all complete the full safeguarding training requirements. They should therefore be aware of their duties with regard to safeguarding.
- If they have any concerns regarding safeguarding they should contact a member of the safeguarding team, following the disclosure procedure.
- The initial health and safety risk assessment undertaken prior to the placement should identify any potential safeguarding risks and steps should be taken to minimise or remove the risk completely.
- Consideration should be given to the circumstances of the placement. Special consideration should be given to the number of supervisory staff and the gender mix between learners and supervising staff. Advice and guidance is available from the safeguarding team.
- Further information can be found in the learners **Workplace policy**.

Learners

All learners on programmes which require Work Placements as part of the course and where this involves contact with children/vulnerable adults will be subject to DBS checks. The group is committed to ensuring that a learner's choice of study is not adversely affected as a result of clearance requirements.

Learners will be required to apply to the DBS via their centre as part of their enrolment process. The Operations Director has overall responsibility for ensuring that the policy is adhered to and placements are planned at the beginning of the term.

Those in DBC Training who are involved in the admissions process will receive appropriate guidance in identifying and assessing the relevance and circumstances of offences and to comply with the centre's policies and procedures.

Appendix J

Advice and procedures for staff regarding touch and restraint

This procedure applies to all learners in DBC Training centres and covers all centre-related activity when a learner is in the legitimate care of a member of centre staff (for example trips, visits, placements).

The purpose of this procedure is to inform staff of the process to follow in response to an incident that may require reasonable use of force or restraint.

Force cannot be used as a punishment – this is unlawful.

Advice for staff

The [Education and Inspections Act 2006 Section 165](#), which inserts [Section 85c into the Further and Higher Education Act 1992](#) (c.13), gives power to members of staff of further education institutions to use force.

DBC Training recognises that there may be occasions where members of staff are required to use reasonable force either to defend themselves or protect others from injury. The term 'reasonable' in these circumstances means 'using no more force than is needed' however the use of force to restrain or physically direct another person should be regarded as a last resort. A general culture of limited touch should apply with physical intervention avoided if possible.

Whilst there are situations in which there is no safer alternative, individual members of staff should try to minimise the chance of these arising by:

- Creating a calm, orderly and supportive centre environment that minimises the risk of violence of any kind.
- An active approach to teaching learners how to manage strong emotions.
- Having regard to avoiding actions that may be seen as inciting violence.
- Effective management of individual incidents.
- Avoiding any physical contact with any other person unless essential to teaching and learning process or normal working arrangements.

Preventative measures will not always work. Therefore, in the circumstances where members of staff judge that the risks associated with not using force are greater than those associated with using force, they should follow the DBC Training guidance and procedures. Staff using any force who have been properly trained for their role in centre and follow the guidance and procedures will be fully supported by DBC Training in the event of any legal action taken by a learner as a result of the application of force.

Authorisation to restrain

All members of staff are authorised by the MD to use necessary and reasonable force to prevent or stop a potentially harmful/violent or dangerous act taking place where the well-being of learners or another member of staff is at risk. The decision to restrain another individual is to be made solely by the member of staff and they do so under their own instruction/volition. There is no expectation for staff to intervene in a harmful/violent or dangerous situation where they feel their own wellbeing/health would be at risk.

Restraint is where a necessary amount of force to prevent a person from causing damage/harm to themselves or others is used by a member of staff to stop their actions. All learners at the centre, including under 16s, can be restrained by members of staff. Where a member of staff has applied necessary restraint appropriately, DBC Training will support their actions. If a learner or member of staff chooses to complain or take legal action against a member of staff in relation to the reasonable use of restraint where it had prevented harm to others, DBC Training will support the member of staff who applied the necessary restraint.

Members of staff should also be aware if force was used against learners or members of staff that was not considered necessary and/or reasonable this may be viewed as a disciplinary offence and may result in dismissal.

Where force can be used

Staff may only exercise the statutory power to use force where:

- they and the learner are on centre premises
- they are off centre premises, but are in lawful control or charge of the learner (for example on a planned visit or at offsite facilities).

Other than in these circumstances, staff have only common law rights to use force to defend themselves, persons or property (for example a member of the public on site who is not covered by a learning agreement).

Incidents where restraint may be used

A member of staff may only use force to prevent a learner from doing (or continuing to do) certain prescribed actions, namely:

- A. Committing a criminal offence.
- B. Causing personal injury to, or damage to the property of any person (including the learner).
- C. Prejudicing the maintenance of good order and discipline at the centre.

Examples of situations that fall into the above categories A and B are:

- a learner attacks a member of staff, or another learner
- learners are fighting
- a learner is committing, or on the verge of committing, deliberate or serious damage to property or to themselves
- a learner is causing, or at risk of causing, injury or damage by accident, by dangerous play, or by misuse of dangerous materials or objects
- a learner is running or behaving inappropriately in a corridor or on a stairway in a way in which he or she is likely to have or cause an accident which may injure him, herself or others
- a learner aged under the minimum school leaving age absconds from a class or tries to leave the campus other than at an authorised time. The judgement on whether to use force in this situation would depend on an assessment of the degree of risk to the learner if he or she is not kept in the classroom or centre (age and understanding would be critical factors)

Examples of situations that fall into category C. Are where the learner:

- is behaving in a dangerous way that is seriously disrupting a lesson
- blocks a door to prevent others from leaving

- is using a mobile phone to disrupt a lesson (a member of staff could forcibly confiscate the phone by removing it from a hand or desk but could not lawfully search the learner for the phone)
- resists attempts to search him or her for a weapon (see the **Learner Search** policy)

Decisions on whether to use force must depend on judgements about:

- the seriousness of the incident as judged by the effect of the injury, damage, or disorder, which is likely to result if force is not used
- the chances of achieving the desired result by other means
- the relative risks associated with physical intervention compared with using other strategies

There is no legal definition of what degree of force is reasonable, it will always depend upon the precise circumstances of the individual case; however the degree of force used should always be:

- in proportion to the consequences it is intended to prevent; and
- the minimum needed to achieve the desired result.

When reaching a decision about using force, staff will need to take into account relevant factors related to any special educational needs or disabilities a particular learner may have.

The Crown Prosecution Service view of reasonable force is:

A person may use such force as is reasonable in the circumstances for the purposes of:

- self-defence
- defence of another
- defence of property
- prevention of crime
- lawful arrest

In assessing the reasonableness of the force used, prosecutors should ask two questions:

- was the use of force justified in the circumstances, i.e. was there a need for any force at all?
- was the force used excessive in the circumstances?

Procedure regarding touch and restraint

A general culture of limited touch should apply with physical intervention avoided if possible. However, if physical intervention is required to prevent personal injury, damage or the committing of a criminal offence, the following process applies;

1. Staff should use the minimum necessary force to restrain or prevent injury, damage or a criminal act.
2. Staff may require assistance when dealing with an incident that may lead to or require reasonable use of force or restraint. Staff should call for support from colleagues in the immediate area and in extreme circumstances the Police may be called.
3. Incidents should be reported as soon as is practicably possible to the Designated Safeguarding Lead or to the Operations Director.
4. The Designated Safeguarding Lead will inform the Operations Director and Managing Director
5. The Designated Safeguarding Lead will log the incident and include the following details:
 - a short narrative of what happened including dates, times, people present, location.
 - any force or restraint method used, for example restrictive holds
 - if the incident caused injury or distress

- justification for the use of force? This is particularly relevant where the judgement was very finely balanced
6. Any injuries will require the completion of the standard centre accident form.

Post-incident support

Serious incidents can be upsetting and can result in injuries. Managers should ensure support by:

- providing first aid treatment on site or seeking medical assistance for injuries beyond basic first aid.
- transferring to hospital any person where further treatment is required or recommended. Those under the age of 18 should be accompanied by a member of staff who should stay with them until they are 'handed back' to their parent or guardian/ carer.
- ensuring that learners and staff who are affected by an incident have continuing support for as long as necessary by using the centre's existing support networks in respect of:
 - physical consequences
 - support to deal with emotional stress or loss of confidence
 - analysing / reflecting on the incident

Complaints

All complaints will be dealt with following the centre's standard **complaints procedure**.

Training

Restraint training will be delivered to all staff who have face to face classroom contact with learners in the year 2022 with training be provided annually thereafter. Training will be delivered through www.getsafetraining.co.uk.

Responsibility for the monitoring of this procedure

It will be the responsibility of the head of learner support to monitor the effectiveness of this procedure by:

- assessing the nature and frequency of relevant incidents;
- monitoring any complaints or risks associated with the policy.

Reasonable force

Reasonable force covers the broad range of actions used that involve a degree of physical contact with learners to control or restrain.

There is no legal definition of what degree of force is reasonable, it will always depend upon the precise circumstances of the individual case; however, the degree of force used should always be:

- in proportion to the consequences it is intended to prevent; and
- the minimum needed to achieve the desired result.

When reaching a decision about using force, staff will need to take into account relevant factors related to any special educational needs or disabilities a particular learner may have.

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In assessing the reasonableness of the force used, prosecutors should ask two questions:

- was the use of force justified in the circumstances, i.e. Was there a need for any force at all?
- was the force used excessive in the circumstances?

Appendix K

Prevention of violent extremism – the ‘Prevent’ agenda

1. In February 2008 the Government published guidance to local partners including training centres on preventing violent extremism [1]. While the guidance was prompted following examples of Al Qaida behaviour, it is also aimed at reducing the risk of radicalisation of vulnerable people by other groups, including some Animal Rights Groups and Far Right Groups.
2. Prevent is about preventing people and our learners from being drawn into terrorism or into supporting terrorism. Prevent takes a multi-agency approach and is about managing risks. Prevent:
 - responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views;
 - provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support;
 - works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.
3. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. To reduce the risk from terrorism we need not only to stop terrorist attacks but also to prevent people becoming terrorists. This is one objective of prevent, part of [CONTEST](#), the Government’s strategy for countering international terrorism.
4. Radicalisation is usually a process over time, not a single event and during that process, behaviours as well as opinions are likely to change. These changes may be apparent to the friends, families and work colleagues of the person concerned, along with teachers. As part of wider safeguarding responsibilities centre staff will be alert to:

Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of centre, such as in their homes or community groups, especially where learners have not actively sought these out;

- graffiti symbols, writing or art work promoting extremist messages or images;
 - learners accessing extremist material online, including through social networking sites;
 - parental/agent reports of changes in behaviour, friendship or actions and requests for assistance;
 - Local authority services, police reports of issues affecting learners in other training centres, colleges, universities, schools or other settings;
 - learners voicing opinions drawn from extremist ideologies and narratives;
 - use of extremist or 'hate' terms to exclude others or incite violence;
 - intolerance of difference, whether secular or religious or, in line with our **Equality & Diversity** policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;
 - attempts to impose extremist views or practices on others;
 - Anti-western or Anti-British views
5. Training centres have a specific role to:

- protect and prevent members of the centre community, particularly young learners and vulnerable adults from being radicalised and drawn into terrorism
- spotting risks and reporting when they are concerned
- working with other agencies to deal with any risks

6. Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity. The aim of Prevent is to stop people becoming or supporting terrorists, by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working in key sectors and institutions.

7. Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to identify individuals at risk of being drawn into terrorism; assess the nature and extent of that risk; and develop the most appropriate support plan for the individuals concerned. Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity.

8. DBC Training staff should be aware of signs of radicalisation and have the confidence to report their concerns.

- all staff complete the home office online training pre-commencing employment and prevent is included within the level 2 safeguarding training for all staff. There are also specific training sessions on this agenda throughout the year.
- designated staff complete WRAP (Workshop to Raise Awareness of Prevent) training.

9. Any concerns should be recorded in writing and reported to the Designated Safeguarding Lead and Operations Director. They will liaise with the contact at the appropriate police authority following the procedures in the joint protocol.

10. DBC Training will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.

11. DBC Training will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.

12. DBC Training have a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject and must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of learners they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of DBC Training and could constitute gross misconduct.

13. DBC Training will provide appropriate support through its own staff or by referral to external agencies, for any learner in danger of radicalisation.

14. DBC Training has robust procedures for identifying and assessing the risks posed by visiting speakers and external parties hiring rooms on campus. Any concerns are referred to the Designated Safeguarding Lead for assessment of risk and potential refusal of entry if the risk threshold is exceeded. Institutional effectiveness refers concerns about room bookings to the Designated Safeguarding Lead for similar risk assessment. All visiting speakers will be

supervised by a member of group staff, who are expected to interject or stop the event if they feel the speaker is promoting extremist views or inequality in any form.

15. DBC Training keeps learners safe from the influence of radicalisation when learning onsite through the use of filtering systems as a means of restricting access to harmful content. DBC Training enforces an **Acceptable Use** policy for its users which explicitly outlines user guidelines and responsibilities in line with company expectations. As some young people and staff may legitimately conduct online research into terrorism and counter-terrorism as part of their studies, the group has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes.

16. Whistleblowing where there are concerns of extremism or radicalisation, learners, staff and governors will be encouraged to make use of our internal systems to 'whistleblow' or raise any issue in confidence, see **Whistleblowing** policy. They must inform the Designated Safeguarding Lead or Operations Director straight away.

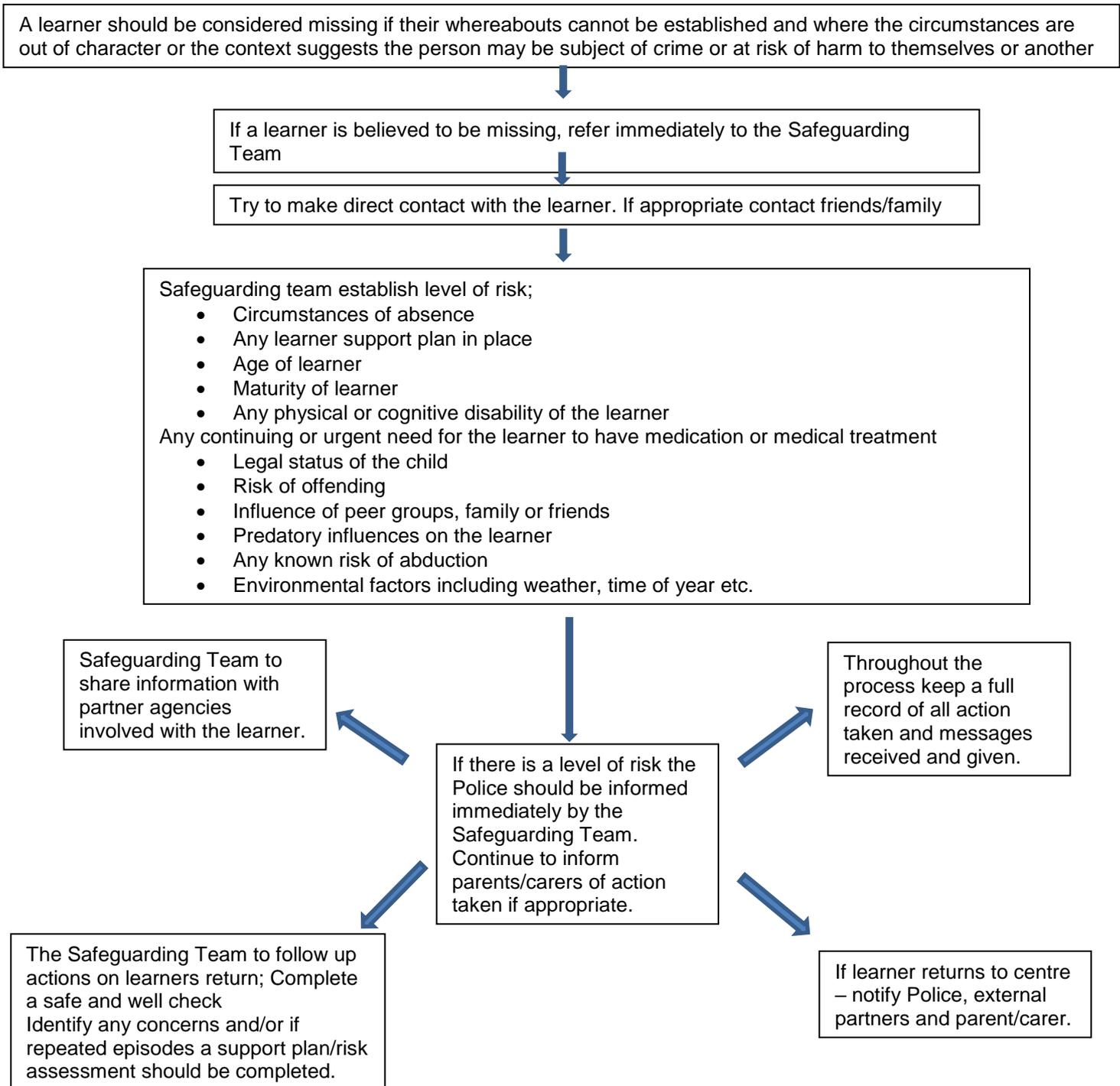
17. DBC Training mission is Delivering Better Choices, Creating Brighter Futures. Learning is powerful in equipping people with the knowledge, skills and critical thinking, to keep themselves safe and prepare them for life in modern multi-cultural Britain and globally. DBC Training aims to develop and nurture learners by:

- using the curriculum and enrichment activities to embed and contextualise British Values
- developing the content and influence of the tutorial programme with learners, enabling a growing understanding of the political, moral, social and religious issues that can lead to extremist ideologies and avoiding its development (covering democracy, freedom of speech, the rule of law, human rights and responsibilities);
- systematically challenging the myths and assumptions that lead to people becoming alienated and disempowered, through good tutoring, opportunities for discussion and debate;
- using teaching approaches which help our learners to build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills;
- creating learning environments that provide a safe place where learners can express free thought, explore controversial issues safely and where our tutors encourage and facilitate this;
- encouraging learners to respect one another and to respect and tolerate difference, especially those of a different faith or no faith others, with particular regard to the protected characteristics set out in the [Equality Act 2010](#);
- having a clearly communicated and consistently applied our **Disciplinary policy** so that learners understand what is expected of them and the consequences of both meeting and failing to meet these expectations;
- implementing our code of conduct which is regularly referred to and communicated with learners;
- adopting restorative approaches, where possible, to resolve any difficulties between members of our centre;
- having a rigorous commitment to learner safety on- and off-site;

[1] [Learning Together to be Safe](#): A toolkit to help centres contribute to the prevention of violent extremism. February 2009 Department for Innovation, Universities and Skills
www.dius.gov.uk

Appendix L

Missing persons procedure



All staff should be aware that children going missing, particularly repeatedly, can act as vital warning sign of a range of safeguarding possibilities.

Appendix M

County Lines Guidance and Procedure

The UK Government defines county lines as:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. [Criminal exploitation of children and vulnerable adults: county lines - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

What is County Lines Exploitation?

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the Police, The National Crime Agency, a wide range of government departments, local government agencies, educational establishments and VCS (voluntary and community sector) organisations.

How does it affect young people and vulnerable adults?

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. Carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection). It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a young person who engages in county lines activity to stop someone carrying out a threat to harm his/her family.

Who is vulnerable to county lines exploitation?

The national picture on county lines continues to develop but there are recorded cases of:

- children as young as 12 years old being exploited or moved by gangs to courier drugs out of their local area; 15-16 years is the most common age range

- both males and females being exploited
- white British children being targeted because gangs perceive they are more likely to evade police detection but a person of any ethnicity or nationality may be exploited
- the use of social media to make initial contact with children and young people
- class A drug users being targeted so that gangs can take over their homes (known as 'cuckooing').

We do know that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- having prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a physical or learning disability
- having mental health or substance misuse issues;
- being in care (particularly those in residential care and those with interrupted care histories)
- being excluded from mainstream education, in particular attending a pupil referral unit.

Signs to look out for

A young person's involvement in county lines activity often leaves signs.

A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person's lifestyle should be discussed with them.

Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- persistently going missing from school or home and / or being found out-of-area;
- unexplained acquisition of money, clothes, or mobile phones
- excessive receipt of texts / phone calls and/or having multiple handsets
- relationships with controlling / older individuals or groups
- leaving home / care without explanation
- suspicion of physical assault / unexplained injuries
- parental concerns
- carrying weapons
- significant decline in school results / performance
- gang association or isolation from peers or social networks
- self-harm or significant changes in emotional well-being.

What to do if you are concerned

Refer to **Appendix C - Reporting concerns or disclosures relating to safeguarding issues** and follow the standard safeguarding procedure and report to the Designated Safeguarding Lead or the Operations Director, who will then decide on and inform you of the next steps.

Policy Monitoring & Review

This policy will be reviewed annually, in conjunction with other related policy and procedures, and in accordance with relevant guidance and legislation.

Senior Management Team and local team meetings will have safeguarding as a standard agenda item along with Health and Safety and Equality and Diversity. All incidents will be reported to SMT.

Related Policies & Procedures

- Complaints Policy
- Preventing Extremism Radicalisation Policy
- Bullying & Harassment Policy
- E-safety Policy
- Safer Recruitment Policy
- Visitor & External Speaker Policy
- Equality & Diversity Policy