

Safeguarding Policy

Version	5
Title of policy	Safeguarding Policy
Policy owner	Frances Drew
Last review date	12/09/2024
Authorised by	Kerry Bentley
Date for next review	11/09/2025

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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 the safe and supportive learning experience we strive to create. They are **everyone's** responsibility.

We will make every effort to comply with current legislation, ensuring that our Board and Senior Management Team, and all of our staff members understand and meet their safeguarding responsibilities.

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.

We recognise that all learners, including those who are defined as young people (children), vulnerable learners and/ or adults at risk have the right to protection, to be listened to and have their opinions heard, and are signposted to the most appropriate organisation if needed for guidance, information and counselling services.

As a Training Provider, DBC complies with its responsibility under the Counter Terrorism and Security Act (CTSA) 2015 to have due regard to the need to prevent people from being drawn into terrorism.

Signed 

Date

Kerry Bentley Managing Director, DBC Training

Purpose

Safeguarding is a term used to denote measures to protect the health, wellbeing, and human rights of individuals, which allow people — children, young people, and adults to live free from abuse, harm, and neglect and exploitation.

It is defined in **KCSIE 2024** as providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, whether that is within or outside the home, including online, preventing the impairment of children's mental and physical health or development ensuring that children grow up in circumstances consistent with the provision of safe and effective care taking action to enable all children to have the best outcomes.

Child Protection is part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Adult Safeguarding is defined in the Care Act as protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

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](#), and 2004
- Working Together to Safeguard Children 2023
- Keeping children safe in education 2023⁴
- [Care Act 2014](#)
- Education Act 2002
- [Education and Training \(Welfare of Children\) Act 2021](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- Protection of Freedoms Act 2012
- Children and Social Work Act 2017
- Modern Slavery Act 2017
- Data Protection Act 2018
- General Data Protection Regulations (GDPR)
- Human Rights Act 1998
- Equality Act 2010
- Online Safety Act 2023
- Guidance for those working with children & young people in Education settings 2022
- Information sharing – Advice for Practitioners providing safeguarding services to children, young people, parents & carers 2024
- Sharing Nudes and semi- nudes: advise for education settings working with children & young people 2024
- [Prevent duty guidance 2023](#)

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

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 need 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.

All staff need to be aware that safeguarding incidents can occur in situations both inside and outside of their families. Young people can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own relationships, criminal exploitation, serious youth violence, county lines and radicalisation ALL concerns, regardless of when or where they have occurred, should be reported in accordance with DBC's procedures.

DBC Training recognises that any member of staff or learner could become susceptible to radicalisation into terrorism and the need to prevent actively works to meet its obligations under the Prevent Duty where there is a concern that a person may be at risk of this. Any form of extremist ideology, radicalisation or terrorist activity is also covered by this policy.

Safeguarding Contact Details

Designated Safeguarding Lead (DSL) & Senior Lead for Safeguarding (Board Member)

Name: Frances Drew (Skills & Quality Director)

Email: frances@dbc-training.co.uk

Deputy Designated Safeguarding Lead (DDSL) Safeguarding & Prevent Manager

Name Rachel Jagger- Thomas (Safeguarding & Prevent Manager)

Email: Rachel.jagger-thomas@dbc-training.co.uk

Managing Director

Name: Kerry Bentley (Managing Director)

Email: kerry@dbc-training.co.uk

Safeguarding Team General Contact Details

Safeguarding Telephone: 07376 423907

Email: safeguarding@dbc-training.co.uk

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 2024](#), 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 stakeholders to be able to access further information upon request.

Our commitment

- We believe that a child or vulnerable adult should never experience abuse, neglect or exploitation 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 volunteers 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 duties as an Education Provider in relation to the Disclosure and Barring Service and Barring referrals guidance
- 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
- Complete an online search for all shortlisted candidates as part of due diligence checks, adverts now specify that these checks are undertaken.

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 relevant to their role. 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 Education Training Foundation (ETF) Online courses for Safeguarding and Safer Recruitment,
 - ACAS Equality & Diversity course

This 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 safeguard children effectively;
- Ensure staff induction training is updated in line with policy changes and that any additions to staff training are also rolled out to all staff currently employed as well as new employees.

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 Partnerships/Boards (LSCP/B) 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, Designated Deputy Safeguarding Lead and a team of managers who are also Centre Safeguarding Officers to support 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 including keeping records of actions taken and DSL/DDSL referral decisions made;
- 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 the relevant external agencies;
- 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. regular safeguarding email circulation of topical issues/main events in that month 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 child on child (Learner on Learner) and harmful sexual behaviours 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 exploitation 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.
- Having a Designated Safeguarding Lead (DSL), and lead Board member for safeguarding as well as having a Safeguarding & Prevent Manager who is our Deputy Designated Safeguarding Lead (DDSL);
- 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 Child on Child/Learner on Learner abuse and Harmful Sexual Behaviours 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;
- Embedding appropriate and effective online monitoring and filtering systems and procedures across our staff and learner IT systems;

- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures;
- Recruiting all staff and volunteers in accordance with our safer recruitment procedures, 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 who are unexplainably and or/ persistently absent from education we:

- Follow DBC Training's procedures for dealing with children who are unexplainably and/or persistently 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 and are accompanied by a member of DBC staff at all times;
- Have clear policies and procedures to that must be complied with in advance and at all times for any visiting or external speakers;
- Ensure they wear a visitor lanyard 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 relevant external agencies and/or, 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 relevant local Authority agreed processes and criteria for safeguarding individuals who may become susceptible to an extremist ideology;
- 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 and Wider Safeguarding Concerns

All staff should be aware of indicators of abuse and neglect. Neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. If a staff member is unsure about a concern, they should always speak with the Safeguarding Team.

Early help - Any child/young person may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in prison or is affected by parental offending
- is in a family circumstance presenting challenges for the child/young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of honour-based abuse such as Female Genital Mutilation or forced marriage
- is a privately fostered child
- is unexplainably and persistently absent from education.

All staff should be aware of indicators of abuse and neglect, and specific safeguarding issues such as exploitation, so that they are able to identify cases of learners who may need help or protection.

It is important to remember that technology is a significant component in many safeguarding and wellbeing issues. Learners are at risk of abuse online as well as in day to day life.

Child/Young Person

In England and Wales, a child is a person under the age of 18 years. A young person is generally thought as of one over the age of 13 years, but under the age of 18 years.

Adult at Risk

Is a person who is aged 18 years or over and at risk of abuse or neglect because of their need for care and support.

Abuse

A form of maltreatment: generally, physically, sexually, or mentally injuring a person. Somebody may abuse or neglect a child/young person or adult at risk by inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience it's affects. Abuse may take place in a family or in an institutional or community setting, by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can be by an adult or adults, or by a child or children.

Bullying

All incidents of bullying, including cyber-bullying, racist, homophobic and gender related bullying are taken seriously, and will be dealt with in accordance with the DBC's **Bullying and harassment policy**

Physical Abuse

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Children - The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless; or unloved; or inadequate; or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say and how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill treatment of others. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger; or the

exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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

Sexual Abuse

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

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by children is a specific safeguarding issue in education and, **must be reported immediately** to the Safeguarding Team.

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

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

Neglect

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

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

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

Adult at Risk- Neglect and acts of omission – including ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however are well placed to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a learner, this should be reported to the Safeguarding Team using DBC Training's safeguarding reporting process.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enables' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber-dependent' (crimes that can be committed only by using a computer). See Online Safety Policy for more information.

Serious Violence

All staff should be aware of indicators which may signal that someone is at risk from, or involved with, serious violent crime. These may include increased absences, a change in friendship groups, significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could indicate involvement with individuals associated with criminal networks or gangs.

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

Both CSE and CCE are forms of abuse that occur where an individual or group take advantage of an imbalance in power to coerce, manipulate or deceive a child/young person into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect both males and females and can include those who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

Exploitation can be by adult males or females, as an individual or in groups. Exploitation may also be by children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. While age may be a contributing factor for an imbalance of power, there are a range of other factors that could make someone more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

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

- Appear with unexplained gifts, money, or new possessions.
- Associate with others involved in exploitation.
- Suffer from changes in emotional wellbeing.
- Misuse drugs and alcohol.
- Go missing for periods of time or regularly come home late, and
- Regularly miss college or do not take part in education.

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 into or manipulated into committing vehicle crime or threatening/committing serious violence to others.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who have older boyfriends or girlfriends, and suffer from sexually transmitted infections, display sexual behaviour beyond expected sexual development or become pregnant.

County Lines

A term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Learners can be targeted and recruited into county lines in a number of locations, including education establishments and social settings, with social media being increasingly used to target and recruit victims.

Cuckooing

Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation.

There are different types of cuckooing:

- Using the property to grow, deal, store or take drugs.
- Using the property to sex work.
- Using the property to store weapons.
- Taking over the property as a place for them to live.
- Taking over the property to financially abuse the tenant.

The most common form of cuckooing is where drug dealers or gang members take over a person's home and use it to store or distribute drugs. They may begin by befriending the adult at risk. They will then offer the adult at risk something of interest to them, this could be a relationship, friendship, drugs and/or alcohol, money, or clothing. In exchange they may ask to 'borrow' a room, to store something or meet other 'friends' at the property. In some cases, the gang may make it clear that this is for criminal purposes, i.e. drug supply, or they may use an excuse as to why they want to use the property.

Gradually the 'benefits' will reduce and may eventually come to an end, and more and more people will come and go from the address. The gang members/drug dealers may threaten the adult at risk verbally or physically if they try to put a stop to their criminal activity. They will also discourage family/friends and support workers from visiting the vulnerable adult's address.

Child-on-Child (Learner-on-Learner) Abuse

All staff should be aware that children can abuse other children. All staff should be clear that **any concerns need to be raised to the Safeguarding Team immediately**, regardless of the age of the Learner, using DBC's reporting process.

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

- abuse in intimate personal relationships between children

- bullying (including cyber-bullying)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- consensual and non-consensual sharing of nudes and semi-nudes' images (**also known as sexting or youth-produced sexual imagery**)
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. DBC Training will not tolerate sexual violence or sexual harassment towards anyone within our organisation.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with additional learning needs and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

Dismissing or tolerating such behaviours risks normalising them.

What is Sexual Violence and Sexual Harassment?

Sexual Violence

It is important that DBC Training staff are aware of sexual violence and the fact learners can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

- **Sexual Assault:** A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is Consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and have the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a person's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual 'jokes' or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment. This may be stand-alone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos
 - sexualised online bullying
 - unwanted sexual comments and messages including, on social media
 - sexual exploitation; coercion and threats
- upskirting.

The Response to a Report of Sexual Violence or Sexual Harassment

The initial response to a report from a learner is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a learner, or a learner makes a report to them, **they should follow the DBC's reporting process so that the Safeguarding Team can follow the appropriate referral process.** As is always the case, if staff are in any doubt as to what to do, they should speak to the Safeguarding & Prevent Manager or the Skills and Quality Director

Radicalisation and Extremism

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

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Prevent duty guidance 2023
- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Terrorism** is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

As with other safeguarding risks, staff should be alert to changes in behaviour that could indicate a learner may be in need of protection and reports to the Safeguarding Team should be made if a concern is identified. This may result in the Safeguarding Team making a Prevent referral.

Indicators of vulnerability to radicalisation include:

- Identity Crisis – the learner is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the learner may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration, local community tensions and events affecting the learner's country or region of origin may contribute to a sense of grievance triggered by personal experience of racism or discrimination or aspects of government policy.
- Unmet Aspirations – the learner may have perceptions of injustice; a feeling of failure; or rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special Educational Need – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism (see also the **Preventing Extremism and Radicalisation Policy**)

Additional Learning Needs and Disabilities

Learners with additional learning needs (ALN) and disabilities can face additional safeguarding challenges. DBC Training acknowledges additional barriers can exist when recognising abuse and neglect in this group of people.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration

- the potential for children/young people/learners with ALN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers.

Domestic Abuse

Includes any incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, an intimate partner or family member regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

Domestic abuse can take different forms, including:

- physical abuse
- sexual abuse
- financial abuse
- coercive control and gaslighting/emotional abuse
- digital/online abuse
- so-called 'honour-based' abuse
- forced marriage
- female genital mutilation (FGM).

Young people can also experience domestic abuse within their own intimate personal relationships. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside the home. Being exposed to domestic abuse has serious, long-lasting emotional and psychological impact on those who experience it.

So-called 'Honour-Based' Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

If an employee, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, this must be reported to the Safeguarding Team immediately and this will be escalated to the police by the Safeguarding Team.

Care and sensitivity should be shown to adults at risk who have been subject to FGM and further support should be sought where required. As this differs from region to region, if in doubt you should contact the Safeguarding Team.

Forced Marriage

A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the people who are marrying.

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter

into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct the purpose of which is to cause a child to marry before their 18th birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Modern Slavery

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

Discriminatory Abuse

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

Homelessness

Being homeless or being at risk of becoming homeless present a real risk to a child's welfare. In most cases, homelessness may be considered in the context of children who live with their families; however, it should also be recognised that, in some cases, 16- and 17-year-olds could be living independently from their parents or guardian (for example through their exclusion from the family home) and they will require support. Children's services will be the lead agency for these young people and the Safeguarding Team will ensure appropriate referrals are made based on the child's circumstances.

All concerns around learner homelessness, regardless of the age of the learner, should be reported to Safeguarding and the learners should be signposted to other support agencies for appropriate help and advice.

Financial or Material Abuse

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

Organisational (sometimes referred to as institutional)

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

Mate Crime

This is when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the person knows, and often takes places in private.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or lone label alone. In most cases, multiple

issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the Safeguarding Team.

Staff should maintain an attitude of 'It could happen here' and should always act in the best interest of our learners.

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

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.

Education, health and care (EHC) plan - An education, health and care (EHC) plan details the education, health and social care support that is to be provided to a child or young person who has SEN

Serious violence - Serious violence covers specific types of crime, such as homicide, knife crime, and gun crime, and areas of criminality where serious violence or its threat is inherent, such as in gangs and county lines drug dealing. It also includes crime threats faced in some areas of the country such as the use of corrosive substances as a weapon

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.

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.

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)

Extra-familial harm - Children may be at risk of or experiencing physical, sexual, or emotional abuse and exploitation in contexts outside their families. While there is no legal definition for the term extra-familial harm, it is widely used to describe different forms of harm that occur outside the home. Children can be vulnerable to multiple forms of extra-familial harm from both adults and/or other children. Examples of extra-familial harm may include (but are not limited to): criminal exploitation (such as county lines and financial exploitation),

serious violence, modern slavery and trafficking, online harm, sexual exploitation, child-on-child (nonfamilial) sexual abuse and other forms of harmful sexual behaviour displayed by

Controlling or coercive behaviour - Also known as coercive control, controlling or coercive behaviour is a form of domestic abuse. In 2015, the offence of controlling or coercive behaviour was introduced under Section 76 of the Serious Crime Act as a criminal offence. Controlling or coercive behaviour is included in the definition of domestic abuse in section 1(3)(c) of the Domestic Abuse Act 2021. Controlling or coercive behaviour is a pattern of abuse (on two or more occasions) that involves multiple behaviours and tactics used by a perpetrator to (but not limited to) hurt, humiliate, intimidate, exploit, isolate, and dominate the victim. It is an intentional pattern of behaviour used to exert power, control, or coercion over another person. Controlling or coercive behaviour is often committed in conjunction with other forms of abuse and is often part of a wider pattern of abuse, including violent, sexual, or economic abuse. Children can be used to control or coerce the victim, for example, by frustrating child contact and/or child arrangements, telling the children to call the victim derogatory names or to hit the victim, or by threatening to abduct the children. This pattern of abuse causes fear, serious alarm and/or distress which can lead to a substantial adverse effect on a victim's day-to-day life. This can have a significant impact on children and young people. Section 68 of the Domestic Abuse Act 2021 came into force on 5 April 2023 and removed the 'living together' requirement for the controlling or coercive behaviour offence, which means that the offence applies to partners, ex-partners or family members, regardless of whether the victim and perpetrator live together.

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.

Financial exploitation - Financial exploitation can take many forms. In this context, we use the term to describe exploitation which takes place for the purpose of money laundering. This is when criminals target children and adults and take advantage of an imbalance of power to coerce, control, manipulate or deceive them into facilitating the movement of illicit funds. This can include physical cash and/or payments through financial products, such as bank and cryptocurrency accounts.

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.

Sexting - Sharing Nudes and Semi Nude (Youth Produced Sexual Imagery)

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.

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. 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 Safeguarding Officers

- Ensure that the learning environment is safe and support Delivery Staff to ensure that safeguarding is embedded within teaching practice to educate learners on staying safe, building resilience and developing critical thinking skills.
- Ensure that staff are aware of and follow safeguarding and cause for concern reporting procedures and work with the Safeguarding & Prevent Manager to act as 'in centre' support when concerns are reported
- Follow DBCs Whistleblowing policy procedure for any concerns relating to staff behaviour or business procedure

Deputy Designated Safeguarding Lead (DDSL):

- Have a responsibility at an operational level within the organisation for day to day management of safeguarding procedures, ensuring specialist safeguarding staff are supported and directed in their duties.
- On behalf of the DSL, acts as the main contact for outside agencies in their capacity as Safeguarding & Prevent Manager
- Undertakes their duties as DDSL as outlined in Annex C of KCSIE 2024
- Ensure regular and time reporting escalation as needed of concerns to the Designated Safeguarding Lead.
- Respond to safeguarding concerns within the agreed timescales.
- Maintains a central register of safeguarding concerns, cause for concerns and monitoring & filtering concerns. Recording all decisions made in relation to action taken or referrals made
- Monitors DBC Training's Single Central Register on a regular basis
- 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
- Will always be available during centre open hours, either face to face or via Teams meetings and/or works with the DSL to arrange suitable cover when this is not possible.
- Will provide regular updates via email to all staff on safeguarding.
- Oversees the provision of resources and training for all staff.

Designated Safeguarding Lead (DSL):

- Is the Senior Member of Staff and Board Member with Safeguarding responsibility in accordance with Annex C of KCSIE 2024 Acts as the main contact for outside agencies and the most senior 'go to' person in the organisation
- Ensures recording all decisions made in relation to action taken or referrals made by the DDSL or DSL.

- Will always be available during centre open hours, either face to face or via Teams meetings or arrange suitable cover when this is not possible.
- 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 overall 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.

Scrutiny and Governance:

- The Board will review regular reports and future action plans from the Keeping you Safe committee on a quarterly basis, drawing in any commentary and responsibility for actions where appropriate.
- The Board will scrutinise and challenge the Prevent Risk register and associated documentation on a quarterly basis and action associated staff accordingly.
- The board will review all companywide staff training plan ensuring that knowledge is kept up to date and relevant.

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. The same applies to any monitoring or filtering alert that is flagged to the receivers and must be dealt with and addressed immediately, with all internet access revoked until resolved.
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 Safeguarding & Prevent Manager, a Manager or the Skills & Quality Director as Designated Safeguarding Lead, who will contact the Managing Director (MD).
- Any suspicion, allegation or actual abuse by a member of staff **must be reported to 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, 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 Safeguarding & Prevent Manager, or Skills and Quality Director as Designated Safeguarding Lead, or a member of the Board.

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

- Record the low-level concerns 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 a member of the Board 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 a member of the Board 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 (Monitoring and Filtering)

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 and for incidents arising from monitoring and filtering alerts.

Procedure

Following an e-safety incident or a monitoring and filtering alert, the following process applies:

1. Depending on the nature of the e-safety incident, it should be reported initially as follows:
 - Conduct initial assessment into the flag/alert, if requires further investigation, then continue below and report, if appears a legitimate search just complete the central log and mark as complete
 - if it involved a learner, it should be reported to the Safeguarding & Prevent Manager as Deputy Designated Safeguarding Lead
 - if it involved a member of staff, it should be reported to the Designated Safeguarding Lead
 - If the incident involves receiving inappropriate images (including nude images) staff must not send or forwarded these images on to anyone, it should be immediately reported to the Safeguarding & Prevent Manager as Deputy Designated Safeguarding Lead or Skills and Quality Director.
 - A referral of the incident may be made to an external agency such as the Police if appropriate.
2. 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
3. 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
4. A record will be kept of decisions made in relation to any referral or other decision & action taken.

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

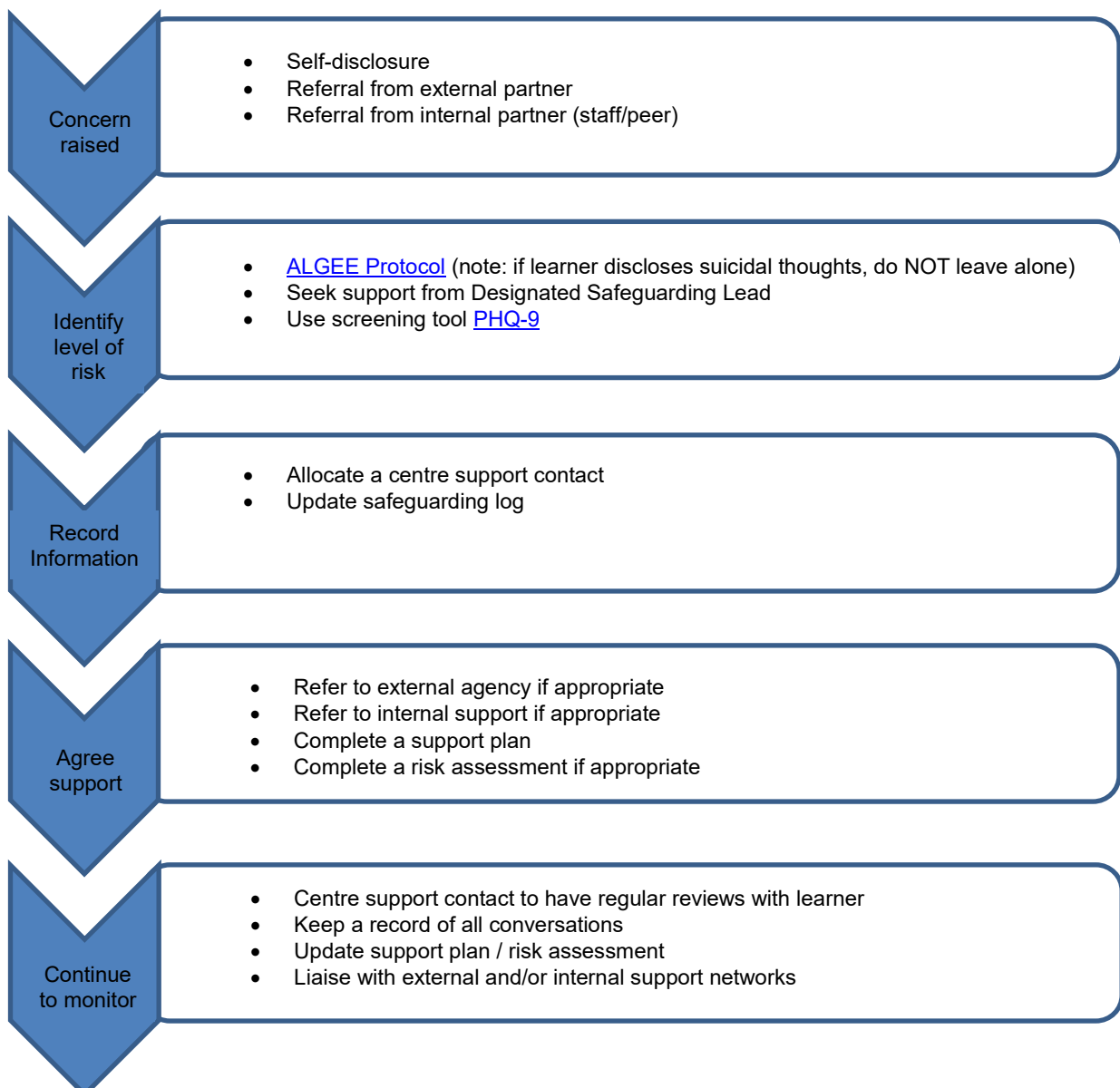
For guidance on dealing with bullying and similar issues please see the **Bullying and Harassment** Policy.

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 contact the designated person of that organisation to open communications.

On receiving an allegation or disclosure of abuse, the Designated person 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 Safeguarding & Prevent Manager as DDSL or Skills & Quality Director as DSL (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 consider 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 consider 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?

Appendix K

Prevention of violent extremism – the ‘Prevent’ Duty

1. In 2011, the Government published the [Prevent Strategy](#) which raised awareness of the specific need to safeguard children, young people and families from extremism and radicalisation which is the holding of extreme political or religious views e.g. animal welfare rights, environmentalists, Extreme right wing, white supremacy groups, anti-gay groups, Islam, Christian ideology. Extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
2. [The Counter Terrorism and Security Act 2015](#) places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (“The Prevent duty”).
3. Prevent is one of the 4 strands of the UK Government’s [CONTEST](#) Strategy, that focuses in specifically on trying to prevent people and our learners from being drawn into terrorism or into supporting terrorism. The Prevent Duty is about keeping our learners both safe and within the law, and not about preventing learners from having political and religious views, rather to support them to develop and discuss those views or act on them in non-extremist ways.
4. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours, and 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.
5. Radicalisation refers to the process is the process of a person legitimising support for, or use of, terrorist violence. Most people who commit terrorism offences do so of their own agency and dedication to an ideological cause. 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

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

Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity.

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.

6. 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.
 - Any concerns should be recorded in writing and reported in accordance with DBC's safeguarding reporting procedures to the Safeguarding & Prevent Manager and Designated Safeguarding Lead. They will liaise with the contact at the appropriate police authority following the procedures in the joint protocol.
7. 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.
8. 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.
9. DBC Training has 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

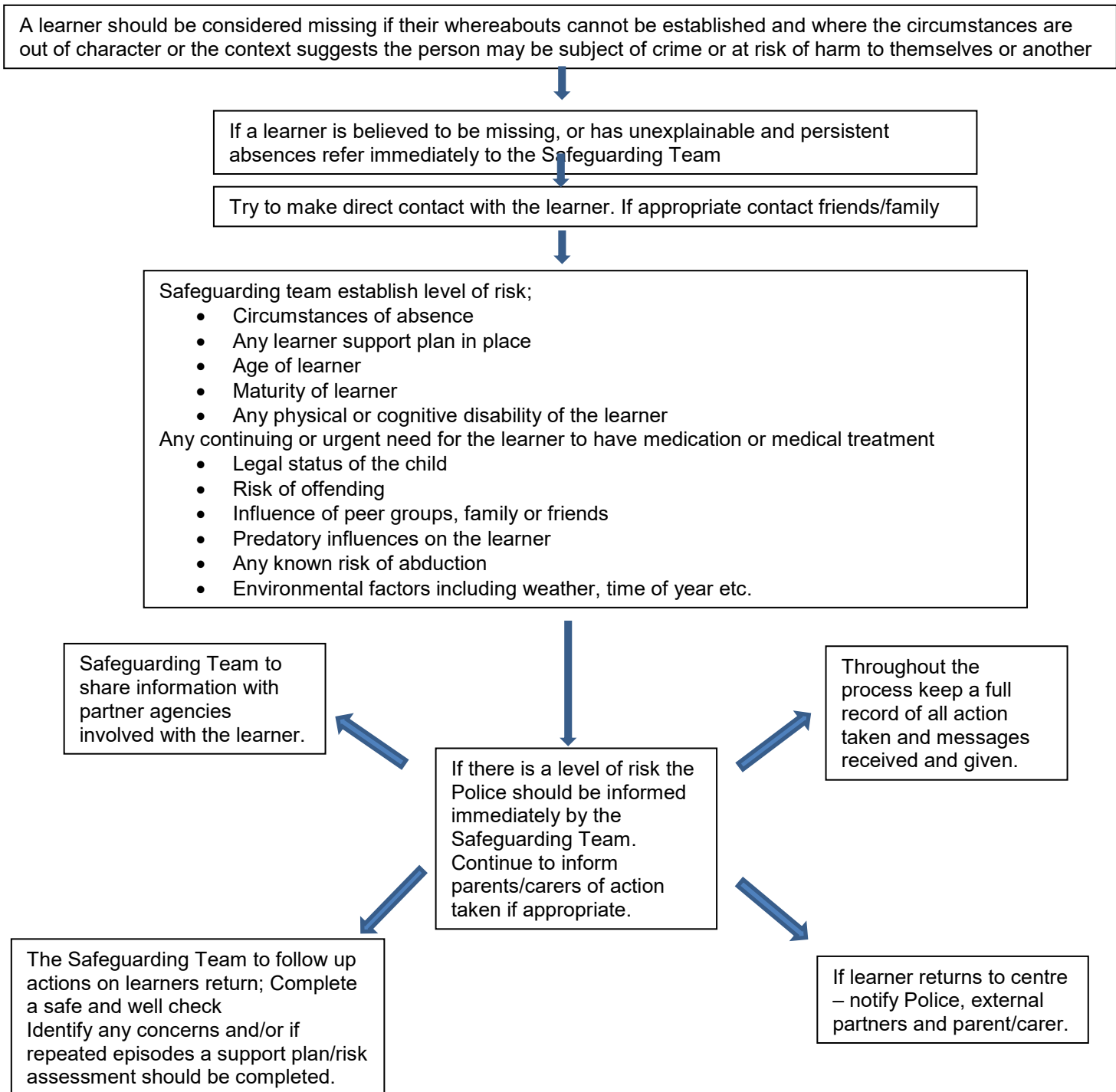
violent extremism is contrary to the values of DBC Training and could constitute gross misconduct.

10. DBC Training will provide appropriate support through its own staff or by referral to external agencies, for any learner in danger of radicalisation.
11. DBC Training has robust procedures for identifying and assessing the risks posed by visiting speakers and external parties hiring rooms in centre. Any concerns are referred to the Safeguarding & Prevent Manager or Designated Safeguarding Lead for assessment of risk and potential refusal of entry if the risk threshold is exceeded. 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.
12. 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 IT 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.
13. Whistleblowing where there are concerns of extremism or radicalisation, learners, staff and governors will be encouraged to make use of our internal systems to 'whistle blow' or raise any issue in confidence, see **Whistleblowing** policy. They must inform the DDSL, or Skills and Quality Director as DSL straight away.
14. 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;

Appendix L

Missing persons procedure



All staff should be aware that children who are have unexplainably and/or persistent absences, 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