

# **Safeguarding including Prevent and Safer Recruitment Policies and Guidance 2024- 2025**



**SURREY  
ADULT  
LEARNING**

Title: SAL Safeguarding and Safer Recruitment Policies 2024-2025

Description: To ensure that SAL has a culture of vigilance where wellbeing is promoted, and consistent, timely and appropriate safeguarding action is taken where needed.

Created By: Deputy Principal

Date Created: August 2024

Date for Review: August 2025

Document Owner: Deputy Principal

Previous version (title and date finalised): SAL Safeguarding and Safer Recruitment Policies 2023-24

Document to be updated on another website? No

Please state location e.g. SES, SCC website etc: Policy available on SAL website

Version Number

Modified By

Modifications Made (page numbers and content if relevant)

Name of approving Assistant Director

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# Introduction

## Our Commitment

Surrey Adult Learning (SAL) is committed to safeguarding and promoting the wellbeing of all learners not just adults at risk of abuse or neglect, young people and children and expects all staff and volunteers to share this commitment. SAL shares the Surrey Safeguarding Adults Board vision that “adults in Surrey live a life free from fear, abuse and neglect”.

SAL will ensure that:

- The attitudes “it could happen here” and that “safeguarding is everyone’s business“ are maintained.
- A “zero tolerance” approach to any type of abuse including sexual harassment and sexual violence is maintained.
- A culture of safeguarding permeates throughout SAL. Staff and volunteers are continually vigilant and maintain professional curiosity. Appreciating that not all learners may feel ready or comfortable to disclose abuse, staff and volunteers will contact the SAL safeguarding team if they have a concern.
- A safe learning environment is created so learners can thrive and achieve; staff, volunteers and learners feel safe, and everyone knows that their wellbeing is a high priority.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in SAL’s safeguarding management or process knowing that their concerns will be taken seriously.
- Our approach to safeguarding is learner-centred; staff and volunteers consider at all times what is in the best interests of the learner.
- Safer recruitment is practised in checking the suitability of staff and volunteers including verification of their identity, teaching qualifications (where applicable), a satisfactory DBS check and references; a single central record is kept for audit purposes.
- Awareness of safeguarding issues and possible indicators, including Prevent, is raised amongst all staff, volunteers, sub-contractors and visitors.
- Staff, volunteers and sub-contractors promote British values and the Prevent agenda.
- Procedures for reporting all cases of reported or suspected radicalisation, abuse or neglect are in place and all staff, volunteers and learners are aware of the process.
- The Safeguarding Staff and Volunteer Code of Conduct is available.

These policies and guidance notes have been written with reference to the Surrey County Council (SCC) Safeguarding Child Protection policy template and Surrey Safeguarding Adults Board’s Guidance on producing adult safeguarding policy and procedures. They take into account relevant legislation and statutory guidance including the Care Act 2014, the Counter Terrorism and Security Act 2015, ‘Keeping Children Safe in Education’ 2023 2024 and relevant SCC staff policies including Whistle blowing, Domestic Abuse, Disciplinary, Grievance, Code of Conduct and Safer Employment and DBS policies. They are for all staff and volunteers working in SAL for SCC and the SAL governors. They provide the framework needed to keep

learners safe and secure at SAL. They are also for use by any sub-contractor or partner organisation.

Decisions by staff, volunteers, sub-contractors and partners whether to report a concern, suspicion, nagging doubt or allegation of abuse or mistreatment are not a matter of individual conscience but are considered a professional duty. This includes any actions by other SAL staff, volunteers or sub-contractors, SCC colleagues or contractors working at a SAL adult learning centre.

Support for staff or volunteers distressed by any disclosure of abuse or neglect will be provided including referral to the SCC Employee Assistance Programme.

Throughout this document the term 'learner' includes apprentice, and 'tutor' includes apprenticeship trainer-assessor.

## Key Contacts for Safeguarding in SAL

Role	Name	Telephone contact	Email
Safeguarding Governor	TBC	TBC	TBC
Designated Safeguarding Lead (DSL)	Lisa Woodward	07968 832445	<a href="mailto:lisa.woodward@surreycc.gov.uk">lisa.woodward@surreycc.gov.uk</a>
Safeguarding Officer	Chrissie Walsh	07968 833357	<a href="mailto:christine.walsh@surreycc.gov.uk">christine.walsh@surreycc.gov.uk</a>
Safeguarding Officer	Sarah French	07977 425168	<a href="mailto:sarah.french@surreycc.gov.uk">sarah.french@surreycc.gov.uk</a>
Safeguarding Officer	Louise Williamson	07970 276055	<a href="mailto:louise.williamson@surreycc.gov.uk">louise.williamson@surreycc.gov.uk</a>
Service Principal	Francis Lawlor	07929 745196	<a href="mailto:francis.lawlor@surreycc.gov.uk">francis.lawlor@surreycc.gov.uk</a>
Chair of Governors	Councillor Clare Curran	01483 404 678	<a href="mailto:clare.curran@surreycc.gov.uk">clare.curran@surreycc.gov.uk</a>

## Key Local Contacts

Who to contact	Contact Details
Emergency Situations	999

### Adult

Who to contact	Contact Details
Surrey Multi-Agency Safeguarding Hub (MASH)	0300 470 9100 Monday - Friday, 9.00am - 5.00pm <a href="mailto:ascmash@surreycc.gov.uk">ascmash@surreycc.gov.uk</a> Out of hours emergency duty team 01483 517898 <a href="mailto:edt.ssd@surreycc.gov.uk">edt.ssd@surreycc.gov.uk</a>

Who to contact	Contact Details
Adult Social Care Contact Centre for information and advice	0300 200 1005 Monday - Friday, 9.00am - 5.00pm <a href="mailto:asc.infoandadvice@surreycc.gov.uk">asc.infoandadvice@surreycc.gov.uk</a>
Police Prevent Supervisor for Surrey.	101 For non-urgent concerns relating to possible radicalisation

### Children

Who to contact	Contact Details
Children's Single Point of Access (C-SPA)	0300 470 9100 Monday - Friday, 9.00am - 5.00pm <a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a> out of hours emergency duty team 01483 517898 <a href="mailto:edt.ssd@surreycc.gov.uk">edt.ssd@surreycc.gov.uk</a>

## Aims and Objectives

Overarching aim – that SAL has a culture of vigilance where wellbeing is promoted, and consistent, timely and appropriate safeguarding action is taken where needed.

Aim / Objective	Examples of ways in which this will be achieved.
To provide a workforce of staff and volunteers who have been checked and deemed safe to work with adults at risk, young people and children.	<ul style="list-style-type: none"> <li>Complying with SCC and SAL safer recruitment practices.</li> <li>Inform all staff during induction of safeguarding procedures for the service including the Staff and Volunteer Safeguarding Code of Conduct.</li> </ul>
Increased awareness of what constitutes abuse, neglect or radicalisation for all staff and volunteers	<ul style="list-style-type: none"> <li>All staff to have completed Safeguarding Initial Awareness and Prevent training as part of recruitment.</li> <li>All staff to undertake Safeguarding including Prevent refresher training when required.</li> <li>All volunteers to complete the Safeguarding Initial Awareness training and Prevent training as part of induction. Safeguarding including Prevent refresher training to be undertaken when required.</li> <li>All staff will be sent a copy of Part 1 or Annex A, Keeping Children Safe in Education (2024). Any staff working with children to also be sent Annex B.</li> <li>SAL's governors will be sent, Keeping Children Safe in Education (2024) at the start of the academic year, or on recruitment if later.</li> <li>Regular reinforcement of safeguarding duties and practice changes and cascade of updates during team / service meetings and staff newsletters.</li> <li>Copy of policy and guidance leaflets available on SharePoint and from any centre on request. The policy is also available on the SAL website.</li> </ul>

Aim / Objective	Examples of ways in which this will be achieved.
Increased awareness among learners of what constitutes abuse, neglect or radicalisation and local issues	<ul style="list-style-type: none"> <li>• Posters and/or leaflets displayed in prominent places or given to learners at induction</li> <li>• Articles included in learner newsletters</li> <li>• Course induction process to include an introduction to safeguarding, Prevent and British values</li> <li>• SAL Safeguarding Policy is made available on the SAL website.</li> </ul>
Staff and volunteers will be aware of their responsibility to protect adults at risk, young people and children from abuse/harm, neglect and safety concerns and will know how to report such concerns	<ul style="list-style-type: none"> <li>• All staff and volunteers to have completed initial awareness safeguarding training and be aware that all concerns must be taken seriously.</li> <li>• All staff and volunteers to undertake safeguarding refresher training when required.</li> <li>• Articles included in staff newsletters.</li> </ul>
Staff, volunteers, and subcontractors to promote British values and Safeguarding including Prevent and online safety contextualising it to learners' everyday lives	<ul style="list-style-type: none"> <li>• Course planning to include explanations during course induction and embedding at relevant points during the course</li> <li>• Spontaneous discussion following national or international events</li> </ul>
Learners will know how to report abuse/harm, neglect and safety concerns or how / to whom they should turn to for advice on any concerns they have	<ul style="list-style-type: none"> <li>• Posters and/or leaflets on how to complain, make comments or report safeguarding concerns to be displayed in the centres.</li> <li>• Information displayed on the centre electronic screens.</li> <li>• Details included in the waiting room before admittance to virtual classrooms where courses are remote.</li> <li>• Tutors to advise learners how to complain/report concerns through their teaching and through the induction of learners.</li> <li>• Action following an analysis of Learner Feedback and course evaluations.</li> </ul>
Learners to understand that British values and Prevent impacts on their everyday life	<ul style="list-style-type: none"> <li>• Clear Learner Charter informing learners of acceptable behaviour which is widely publicised throughout the Service and drawn to the attention of all learners at course induction.</li> <li>• Learner engagement with course induction.</li> <li>• Learner participation in on-course discussions.</li> <li>• British values displayed through centre posters and on the centre electronic screens.</li> </ul>
All learners on IT courses (and courses where IT, social	<ul style="list-style-type: none"> <li>• Tutors to make learners aware of the risks involved with using IT, the internet, e-communication and the Surrey Adult Learning (SAL) E-Safety policy and Safe</li> </ul>



Aim / Objective	Examples of ways in which this will be achieved.
media or the internet is used) to be made aware of safety implications of using IT, the internet and these forms of communication.	<p>Use of Computers, Tablets and Mobile Devices guidelines.</p> <ul style="list-style-type: none"> <li>• Learners to sign agreement about internet use at start of their course where applicable.</li> <li>• Articles included in learner newsletters.</li> <li>• Use of SAL computers, laptops and tablets has adequate IT filters and monitoring systems in place</li> </ul>
Supporting apprentices to stay safe online and monitoring of apprentices' IT usage	<ul style="list-style-type: none"> <li>• Trainer/Assessors will make apprentices aware of the risks involved in using IT, the internet, e-communication and how to stay safe online.</li> <li>• SCC apprentices will comply with the SAL policies above and be made aware of SCC Internet Acceptable Use and IT Security policies.</li> <li>• External employers will have a risk assessment completed prior to enrolling learners onto an apprenticeship. Standards will ensure that employers have appropriate safeguarding, prevent and monitoring IT usage policies in place.</li> </ul>
Robust scrutiny of safeguarding activity in place	<ul style="list-style-type: none"> <li>• At least termly review of cases by SAL safeguarding team.</li> <li>• Termly review of all safeguarding practices by the SAL Safeguarding Review Group.</li> <li>• Termly report sent to board of governors.</li> </ul>
To provide a safe learning environment	<ul style="list-style-type: none"> <li>• Venue risk assessments are maintained and reviewed regularly.</li> <li>• All classes to use and maintain up to date activity risk assessments and other risk assessments/Health and Safety Checklists as applicable.</li> <li>• Health and Safety issues, concerns, faults, near misses, incidents and accidents are reported following the SCC process and action taken.</li> <li>• All tutors to follow the SAL E-Safety Policy and the Safe Use of Computers and the Internet guidance.</li> <li>• Appropriate IT filters and monitoring systems are in place on SAL equipment which are regularly reviewed for their effectiveness.</li> <li>• SAL's Centre Hire, Lettings and Offsite Events and External Speakers policies seeks to ensure the suitability of other individuals, groups or organisations working at any of SAL's centres.</li> <li>• Any safeguarding allegation or concern (no matter how small) about any member of staff, volunteer or contractor will be taken seriously and followed up.</li> </ul>

## Definitions

Who is an Adult at Risk of abuse or neglect and may require safeguarding?

Any person aged eighteen or over who:

- has needs for care and support (whether or not these are currently being met); and
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

(Care Act 2014)

An adult at risk may be:

- An older person who is frail due to ill health, physical disability, or cognitive impairment
- A person who has a learning disability
- A person who has a physical disability and / or a sensory impairment
- A person who has mental health needs including dementia or other memory impairment or a personality disorder
- A person who has a long-term illness / condition
- A person who misuses substances or alcohol to the extent it affects their capability to manage day to day living
- A carer, where the person meets the definition.

Safeguarding and promoting the welfare of children is defined 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 impairment of children's mental or 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.

Children includes everyone under the age of eighteen.

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

What is Abuse?

Abuse is a violation of an individual's human and civil rights by any other person or persons. It may occur as a result of a failure to undertake action or appropriate tasks. It may be an act of neglect or an omission to act, or it may occur where an adult at risk is persuaded to either enter into a financial or sexual transaction to which they have not, or cannot, consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual.

(No Secrets. 2000. DOH)

## **Types of Abuse, Neglect or Exploitation**

Abuse can occur for a number of reasons that maybe inter-related and complex.

There are various types of abuse, and the following list is not exhaustive.

### **Physical Abuse**

Physical abuse/harm is the physical ill treatment of an adult, young person, or child, which may or may not cause physical injury such as:

- Assault and battery
- Hitting
- slapping or scratching
- Pinching or shaking
- Misuse of medication and treatments
- Pushing
- Rough handling
- Unwarranted, or inappropriate restraint, forced isolation or confinement
- Female Genital Mutilation
- Honour-based abuse

### **Sexual Abuse and Exploitation**

The involvement of an individual in sexual activity/ies, to which they have not given informed consent, may not fully comprehend, or with which they do not wish to continue or that violate the social taboos of family roles such as:

- Inappropriate touching or looking
- Non-contact abuse e.g., pornography
- Indecent exposure
- Rape or attempted rape.
- Sexual harassment including via new media communication
- Honour-based abuse

Sexual abuse usually involves acts performed by the perpetrator on the person who is abused but it might sometimes involve situations where the perpetrator forces or persuades the other person to do things to the perpetrator or others. Any sexual activity with a child is sexual abuse. Child sexual exploitation can take many forms from seemingly 'consensual' relationships to serious organised crime by groups or gangs.

While the sharing of nude or semi-nude images and videos of, or with, anyone under the age of eighteen is unlawful, all incidents of this nature will be treated as a safeguarding concern. The safeguarding team will use their professional judgement to assess the risk and decide whether or not to refer to the MASH or police. See appendix 3 for further information.

### **Sexual Violence and Sexual Harassment**

Sexual Violence refers to sexual offences under the Sexual Offences Act 2003.

Sexual Harassment is unwanted conduct of a sexual nature and can occur online and offline. SAL has a “zero tolerance” to both sexual violence and sexual harassment. For further information refer to Appendix 3 and SAL’s Unacceptable Behaviour and Conduct Policy.

### **Financial Abuse**

Misappropriation of an individual’s funds, benefits, savings etc. or any other action that is against the best interests of the person e.g.:

- Theft of money, possessions, property or other material goods.
- Misuse of money
- Fraud or extortion of material assets.
- Internet scamming
- Persuading an adult at risk to enter into a financial agreement, which is to their detriment such as in connection with property, wills or inheritance transactions

### **Psychological Abuse**

Psychological abuse results from being repeatedly made to feel unhappy, anxious, afraid, humiliated or devalued by the actions or inactions and /or attitudes of others. This may include:

- Emotional abuse.
- Humiliation or ridicule.
- Forced marriage.
- Threats of punishment, exclusion or abandonment
- Deprivation of contact with others
- Upskirting
- Intimidation e.g., name calling, threats, shouting or verbal abuse.
- Bullying including cyber-bullying
- Hate crime
- Controlling
- Female Genital Mutilation
- Withdrawal of services or supportive networks

### **Discriminatory Abuse**

Discriminatory abuse is psychological abuse and harassment that is racist, sexist or linked to a person’s age, disability, sexual orientation, cultural background or religion such as:

- Racial harassment.
- Harassment based on gender, gender identity or sexual orientation.
- Insults or harassment based on disability.
- Denial of cultural or religious needs.

### **Learner on Learner abuse (formerly Peer on Peer abuse)**

Learner on learner abuse is where a learner is the perpetrator and abuses another learner. It can take many forms including:

- Sexual violence and sexual harassment. See Appendix 3 for the detailed definition.
- Physical abuse
- Creating and/or sharing of nude or semi-nude images or videos (previously known as sexting)
- Bullying including cyber-bullying
- Initiation/hazing type violence and rituals
- Upskirting

All staff are required to address any inappropriate behaviour even if it appears to be innocent or playful. Dismissing or tolerating such behaviours risks normalising them. We are clear all learner on learner abuse whether online or not, including sexual violence or harassment is unacceptable, will not be tolerated and must be addressed.

### **Organisational Abuse**

Abuse in an institutional setting can occur when the individual's wishes and needs are sacrificed for the smooth running of an organisation. Abuse in an institution includes the practice of a regime or culture that is abusive and destroys the dignity and respect to which every person is entitled. This can include:

- Treating adults as children.
- Denial or failure to promote people's rights.
- Provision of an unsafe or unhygienic environment.
- Lack of privacy.
- Lack of provision for dress, diet or religious observance for adults from ethnic minorities.

Abuse within an organisation can occur when there are poor care standards, rigid routines, inadequate staffing, poor training of staff or a poor safeguarding culture.

### **Professional Abuse**

The misuse of power and of trust by professionals or the failure of professionals to act on suspected abuse/crimes.

### **Domestic Abuse**

Domestic abuse can happen between those who are or who have been 'personally connected' as defined by the Domestic Abuse Act 2021. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse such as Honour-based abuse.

Domestic abuse includes abusive, coercive and controlling behaviours that do not include violence e.g., ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation.

A child or young person under the age of eighteen can be a victim of domestic abuse in their own right if they see, hear or experience the effects of abuse.

## **Modern Slavery**

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

## **County Lines**

County Lines is one form of criminal exploitation where drug networks or gangs groom and exploit vulnerable adults, children and young people to carry drugs and money to a different geographical area. They may also take over the home of a vulnerable adult to use as a drug dealing base; this is known as 'cuckooing'.

Criminal exploitation of a child, young person or adult at risk is a form of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive the child, young person or adult at risk into sexual or criminal activity.

## **Radicalisation, Extremism and Terrorism**

The Prevent Duty for England and Wales places a duty on SAL as an education provider to have due regard to the need to prevent people from being drawn into terrorism.

Since March 2024 extremism has been defined as the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Radicalisation, whether face to face or online, includes exposure of a person over a period of time to extremist viewpoints that may eventually influence the person to engage in an act or acts of violent extremism or terrorism.

SAL seeks to raise the awareness of all learners to the dangers of radicalisation and to keep staff and learners informed of the extremist issues most relevant in Surrey.

The Home Office guidance on The Prevent Duty can be found on the [Home Office Website Prevent Duty](#).

## **Neglect and Acts of Omission**

Neglect can take different forms and can be the result of the deliberate withholding or unintentional failure to provide appropriate and adequate care or support.

Neglect manifests itself in the extent to which a person's physical and/or mental well-being is seriously impaired such as:

- Failure to keep the person clean, warm and in good health or deliberately withholding these necessities.
- Failure to provide or deliberately withholding reasonable care.
- Failure to give or deliberately withholding prescribed medication.
- Failure to give or deliberately withholding privacy and dignity.
- Failure to provide or deliberately withholding supervision for behaviour that could be dangerous.
- Failure to access or deliberately withholding medical care or technical aids.
- Failure to provide or deliberately withholding nourishment.

### **Self- neglect**

Self-neglect covers a wide range of behaviour. It is where someone intentionally or non-intentionally is unable to maintain and care for their own personal hygiene, health or surroundings to culturally accepted standards and there is potential for serious consequences as a result either to themselves or to the community. Examples include hoarding, failing to self-medicate.

### **Other considerations:**

Patterns of Abuse can include:

**Serial abuse** where the perpetrator seeks out and 'grooms' adults at risk. Sexual abuse and radicalisation often fall into this pattern as do some forms of financial abuse.

**Long term abuse** may be part of on-going family dynamics.

**Opportunist abuse** where an opportunity is presented unexpectedly e.g., theft of money that is lying around or someone becoming involved in a group they might not otherwise associate with.

**Situational abuse** where there is stress or pressure in a situation.

**Mental health problems** in some cases can be an indicator that someone has suffered or is at risk of suffering abuse, neglect or exploitation. Past traumatic experiences can have a lasting impact into adulthood and impact on a person's mental health. Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem, but staff are often well placed to have conversations with a learner who might be experiencing a mental health problem or at risk of developing one. Relevant information and links to appropriate support organisations will be made available to the learner. Where staff have a mental health concern about a learner that is also a safeguarding concern, immediate action must be taken, following our safeguarding policy reporting procedures.

**Online Safety** – SAL has adopted SCC’s internet acceptable use policy and requires all staff and learners to comply with its own E-Safety policy. This SAL policy includes SAL’s approach to filtering and monitoring systems and how they are reviewed to ensure effectiveness. Tutors support learners to stay safe online by giving information and signposting learners to further information about the four risk areas – content, contact, conduct and commerce - when relevant to the course subject and learner activities.

It is recognised that SAL must continue to provide a safe environment for all learners whether their course is face to face or remote. It is important that all staff continue to look out for signs that a learner may be at risk. Any such concerns should be dealt with in accordance with SAL’s safeguarding policy.

All staff teaching remotely must be familiar with the SAL Distance Learning policy which includes guidance on safe ways of delivery.

## **SAL contact with Children and Young People**

Throughout these policies and guidance, the terms ‘child’, ‘children’, ‘young person’ and ‘young people’ are used to mean those under the age of eighteen.

Within the Family Learning programme children attend sessions alongside their parents/carers. Within the Supported Learning programme young people from special educational needs school may attend courses with school staff. Apprentices aged under eighteen may be recruited to the Apprenticeship programme. Where other SCC services or external organisations hire rooms in our adult learning centres, children and young people may be in our adult learning centres.

This guidance will ensure those children and young people are also protected from abuse. This responsibility is fully explained in the statutory guidance Keeping Children Safe in Education, Part One of which is sent to all staff who may work with children. Any concern raised with the SAL safeguarding team will be automatically referred to the Child Protection Officer for the school or family centre concerned or referred to C-SPA for advice. In the case of a young apprentice the workplace Safeguarding Officer will be contacted where applicable. If it is an emergency situation, the appropriate emergency services will also be informed first.

SAL recognises that this cohort of learners maybe at greater risk of abuse due to the vulnerabilities associated with their age. Staff working with children and young people and with adults at risk are expected to give additional considerations to every aspect of these learners’ learning to counter this risk and to recognise that additional barriers to reporting abuse may exist.

## **What makes adults at risk, young people and children more susceptible to abuse or neglect?**

In their daily lives all adults, young people and children face the risks from abuse, harassment, exploitation, bullying and crime.

Adults at risk with care and support needs may be at increased risk due to any of the following factors:



- They may be unaware of their rights.
- They may be socially isolated and/or not have support networks.
- They might not know how to complain.
- They may have communication difficulties.
- They may have difficulty understanding certain decisions.
- They may have low self-esteem and therefore lack power in their relationships.
- They may be victims of discrimination due to age, disability, gender or ethnic group.
- They may not have the same access to healthcare.
- They may have limited sex education.
- They may have limited life experiences and therefore find it difficult to anticipate abusive situations.
- They are less likely to be well served by the criminal justice system.
- They are more likely to share living accommodation with people they have not chosen to live with.
- They may need help with personal care.
- They may be dependent on others for their basic needs.
- They may receive support from different carers.
- There may be other factors that predispose abuse including simply getting older.

Children and young people are susceptible to abuse or neglect because:

- They may be unaware of their rights.
- They may be socially isolated.
- They might not know how to complain.
- They may have communication difficulties, or difficulties communicating effectively outside their peer group, for example.
- They may have difficulty understanding certain decisions.
- They may lack power in their relationships with adults and older people.
- They may be victims of discrimination due to disability, gender or ethnic group.
- They may have limited sex education and limited knowledge of sexual practices.
- They may have limited life experiences and therefore find it difficult to anticipate abusive situations.
- They are usually dependent on others for their basic needs.

A child or young person who witnesses abuse may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.

### **Who is a young person, child or adult at risk of radicalisation or being drawn into terrorism and may require safeguarding?**

SAL recognises the positive contribution it can make towards protecting its learners from radicalisation to violent extremism and is committed to fulfilling its duties under the Prevent Duty. Radicalisation is a safeguarding risk.

People can be drawn towards the process of radicalisation in many ways, but some people are more susceptible to radicalisation (V2R) because of their circumstance,

experiences or state of mind. An adult at risk of radicalisation or being drawn into terrorism may be a person who:

- Is at a transitional time of life e.g., moving to a new area/country, recovering from major illness or experiencing a significant life event such as bereavement or homelessness.
- Feels alienated or insecure following a recent trauma.
- Feels they have been unfairly treated and have a grievance.
- Is experiencing a relevant mental health issue.
- Is a member of a group or organisation but is not fully aware of the group or organisation's true intentions.
- Feels isolated, lonely or lacking self-esteem and wishes to belong and feel part of something.
- Has friendship networks which include people already involved in extremism.
- Is susceptible to indoctrination e.g., they may lack moral role models in their life.
- Has unmet aspirations and desires for greater power and respect.
- Has a desire for political or moral change.

A young person or child may be at risk of radicalisation or being drawn into terrorism because of their age and/or limited life experiences.

## **Adults, Young People and Children with Special Educational Needs (SEN) and Disabilities**

SAL recognises that there may be additional safeguarding challenges for any learner with SEN and other disabilities including:

- A learner's behaviour, mood, distress and injury may relate to possible abuse and not just the learner's SEN or disability.
- Any bullying may have a greater impact on a learner with SEN and a disability.
- Communication difficulties.
- Higher risk of peer group isolation.

The Supported Learning team are available to assist the SAL safeguarding team where necessary when any staff or volunteer working with a learner with SEN or disabilities has concerns.

## **Equality**

Abuse or neglect can happen to anyone no matter who they are. To ensure that no one suffers from unlawful discrimination, all services will be provided in a manner that respects age, race, religion and belief, sex, sexual orientation, disability, pregnancy or maternity, gender reassignment, marriage and/or civil partnerships. Individual rights, dignity and privacy will also be protected.

## **Staff and Volunteers**

SAL will not tolerate harassment, bullying or discrimination against its staff or volunteers. Any staff member or volunteer who has a concern about such matters should speak to their line manager or the Principal and/or follow the appropriate SCC policy.

## 2. Safeguarding Policy

### Purpose

1. To provide all staff and volunteers with a clear framework to ensure all policies, procedures and practice relating to safeguarding adults at risk, young people and children are followed.
2. Promote increased awareness and recognition of the issues surrounding the abuse neglect, exploitation, mistreatment and radicalisation of adults at risk, young people and children.
3. Ensure that all staff and volunteers understand their responsibility to protect adults at risk, young people and children from actual, or the risk of, abuse or neglect whenever they are in a position to do so.
4. Ensure that when actual, or the risk of abuse, neglect, exploitation, mistreatment and radicalisation is known or suspected appropriate action is taken.

### Responsibilities

Where it is believed that an adult with care and support needs, young person or child is experiencing, or at risk of, abuse, neglect or radicalisation, the procedures within this policy will be followed.

All adults working with adults at risk, young people or children have a responsibility to safeguard and promote their wellbeing. There are, however, key people within SAL who have specific responsibilities under safeguarding procedures:

### SAL Safeguarding Team

Name	Contact	Phone
SAL Safeguarding Team	<a href="mailto:SAL.Safeguarding@surreycc.gov.uk">SAL.Safeguarding@surreycc.gov.uk</a>	n/a
Lisa Woodward, Designated Safeguarding Lead (DSL)	<a href="mailto:lisa.woodward@surreycc.gov.uk">lisa.woodward@surreycc.gov.uk</a>	07968 832445
Sarah French, Safeguarding Officer	<a href="mailto:sarah.french@surreycc.gov.uk">sarah.french@surreycc.gov.uk</a>	07977 425168
Chrissie Walsh, Safeguarding Officer	<a href="mailto:christine.walsh@surreycc.gov.uk">christine.walsh@surreycc.gov.uk</a>	07968 833357
Louise Williamson, Safeguarding Officer	<a href="mailto:louise.williamson@surreycc.gov.uk">louise.williamson@surreycc.gov.uk</a>	07970 276055

The duties and responsibilities of the DSL are outlined in Keeping Children Safe in Education (2024), Annex C.

The safeguarding team's responsibility is to respond to safeguarding situations, concerns and queries as they arise. They will ensure that information is accurately

recorded and stored, facilitate inter-agency liaison and ensure SAL staff and volunteers have access to the most current and relevant information.

The DSL will act as the single point of contact for Prevent and the Safeguarding Officers will act as the deputy single point of contact.

## **Safeguarding and Prevent training**

The SAL training requirements for staff and volunteers are contained in Appendix 3.

## **Is it Safeguarding?**

It may be the case that the staff member or SAL volunteer is unsure if the matter is covered within the Safeguarding Policy. In this case they should contact the safeguarding team to discuss their concerns.

In circumstances where the safeguarding team are not available, the staff member can discuss this in the first instance with their immediate line manager or Service Principal only or take advice from the Adult Social Care Contact Centre before a decision is made on whether or not to report the matter as a safeguarding concern to Surrey's Multi Agency Safeguarding Hub (MASH).

## **Procedures**

### **Stage 1**

If a staff member or volunteer:

- Observes something that they feel constitutes actual or the risk of abuse, neglect, exploitation or radicalisation or
- Is informed about actual or the risk of abuse, neglect, exploitation or radicalisation or
- Is told something that they feel constitutes actual or the risk of abuse, neglect, exploitation or radicalisation

**They are responsible for immediately alerting the SAL safeguarding team as soon as possible but within 4 hours. Doing nothing is not an option.**

The staff member or volunteer must make a written record of the incident observed or the disclosure made and pass this to the safeguarding team within the working day or the next working day if the incident observed or disclosure made takes place between the hours of 6pm – 8am (weekdays) or on a weekend or Bank Holiday. It is recommended that the staff member or volunteer uses the online [SAL Safeguarding Reporting Form](#), rather than emailing the information to the [SAL.Safeguarding@surrey.cc.gov.uk](mailto:SAL.Safeguarding@surrey.cc.gov.uk)

If a written record has been received from the adult at risk, young person or any witness. The staff member or volunteer must alert the SAL safeguarding team as soon as possible but within 4 hours. Doing nothing is not an option. The written record should be passed to the safeguarding team within the working day or the next working day if it is received between the hours of 5pm – 9am (weekdays) or on a weekend or Bank Holiday.

## **In emergency situations**

Where the person needs immediate medical attention or where the abuse or neglect is observed, immediate action should be taken to safeguard the adult at risk, young person or child and evidence should be preserved. In this case the emergency services should be contacted on 999.

## **SAL Safeguarding team not available**

If the SAL safeguarding team are not available, the Surrey Multi-Agency Safeguarding Hub (MASH) should be contacted unless the concern is an emergency or in connection with radicalisation when the emergency services or Surrey Police Prevent Team for Surrey should be contacted. The Service Principal must also be informed.

If it is between the hours of 5pm and 9am (weekdays) or at a weekend or on a public/bank holiday, then the MASH out of hours Emergency Duty Team must be informed unless the concern is an emergency or in connection with radicalisation when the emergency services or Surrey Police must be contacted. The safeguarding team must be alerted the next working day.

Note: If the concern is about a child the Children's Single Point of Access (C-SPA) should be contacted instead of the MASH.

## **External contacts if the SAL Safeguarding team are not available**

999 For emergency situations

### **Adults**

Surrey Multi-Agency Safeguarding Hub (MASH)  
Monday - Friday, 9.00am - 5.00pm  
0300 470 9100  
[ascmash@surreycc.gov.uk](mailto:ascmash@surreycc.gov.uk)  
[Safeguarding Professional Referral \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/safeguarding-professional-referral)

For a concern that cannot wait until the next working day

Out of hours emergency duty team 01483 517898

Email [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)

### **Children's**

Children's Single Point of Access (C-SPA)

Monday - Friday, 9.00am - 5.00pm

0300 470 9100

[cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

## **For a concern that cannot wait until the next working day**

Out of hours emergency duty team 01483 517898 [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)

To discuss a concern that someone may be at risk of being drawn into terrorism call the national police Prevent advice line 0800 011 3764 or Surrey police using 101.

To make a referral to the Surrey Police Prevent Team complete the [Prevent Referral From Surrey](#) and email to [preventreferrals@surrey.police.uk](mailto:preventreferrals@surrey.police.uk)

Call 101 for further advice on how to refer someone to Prevent.

Service Principal - Francis Lawlor - 07929 745196

## **Exceptions**

The exception to this procedure will be in those cases of known female genital mutilation (FGM) where there is **a mandatory reporting duty** for the tutor to report directly to the Police where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The DSL should also be made aware.

## **Stage 2**

Upon receipt of any verbal or written report the receiving safeguarding team member will make any necessary referrals to the appropriate external agencies such as:

- MASH, Adult Social Care locality team or contact centre, Apprentices workplace Safeguarding Officer
- Community Mental Health Recovery Services
- The Police where a crime may have been committed
- The emergency services
- Surrey Police Prevent Team using the Prevent Referral Process
- Care Quality Commission
- Education and Skills Funding Agency

The procedures and advice from the external agencies will then be followed and records maintained.

If the safeguarding team member feels unsure whether a referral is necessary, they can phone the Adult Social Care Contact Centre, MASH or C-SPA to discuss concerns.

The Surrey Police Prevent Team will assess all reported Prevent concerns and if an intervention is deemed necessary a Channel panel will be convened to devise a support package. If the concern does not meet the threshold, the DSL will consider

signposting or referring to other agencies as part of the internal SAL support for the individual. Any concerns connected with possible or actual radicalisation will also be reported to the Service Principal and the SCC Assistant Director – Safer Communities.

The safeguarding team member will keep detailed, accurate records that include the rationale of decisions made and action taken. This will be stored electronically and securely available only to the Safeguarding team and the Service Principal.

The staff member or volunteer who raised the concern or passed on the disclosure should be kept informed on what has happened by the safeguarding team. If the staff member or volunteer is concerned that appropriate action has not been taken by the safeguarding team, they can inform the Service Principal or Safeguarding Governor and/or may contact the MASH directly.

## **Governance, monitoring and quality assurance**

Reports of all disclosures or concerns will be made by the DSL. These will be anonymised and submitted on a termly basis to the SAL Safeguarding Review Group and to the Board of Governors. A safeguarding report will form part of the Service Principal's termly reporting to the governors.

The Board of Governors will provide scrutiny and challenge to ensure that:

- There is a whole Service approach to Safeguarding with all staff and volunteers knowing they have a responsibility to be alert to the signs and indicators of possible abuse and who to refer concerns or disclosures to
- SAL's safeguarding policies and procedures are effective and reviewed annually and available on the SAL website.
- SAL operates a safer recruitment procedure that includes checks on staff and volunteer suitability to work with adults at risk and, where applicable, children and young people, and by ensuring that there is at least one person on every recruitment panel who has completed Safer Recruitment training or the equivalent.
- All staff and volunteers (including the Safeguarding team) have been trained appropriately and all staff have received the current version of KCSIE and the Safeguarding Code of Conduct.
- SAL has procedures for dealing with allegations against staff, volunteers and learner on learner abuse.
- Appropriate filtering and monitoring systems are in place and regularly reviewed for effectiveness.
- A nominated governor for safeguarding is identified and a member of the SAL senior management team is identified as the DSL.
- DBS checks at the highest level possible are in place for all governors who may have unsupervised access to adults at risk, young people or children learning with SAL.
- That any room hire includes appropriate safeguarding arrangements
- Any weaknesses in safeguarding are remedied immediately.

The DSL together with the Safeguarding Officers will review all Safeguarding concerns and disclosures at least termly to agree whether the action taken provided a good outcome for the learner and whether any further training is required or whether any weaknesses in the procedure identified have been remedied.

SAL will monitor the quality of its safeguarding by:

- Monitoring reviews of cases and any complaints received by the SAL Safeguarding team on at least a termly basis.
- Submitting an anonymised concerns and disclosure log to the SAL Safeguarding Review Group and to the Board of Governors on a termly basis.
- A safeguarding report will form part of the Service Principal's termly reporting to the governors.
- Annual learner surveys
- Discussions with learners at formal lesson observations and informal class visits
- Providing monitoring or audit information to the Surrey Safeguarding Adults Board, if requested.

### **Early identification of possible safeguarding need**

If a learner discloses something at Information, Advice and Guidance (IAG), or enrolment that indicates there might be a possible safeguarding issue, a tick beside Refer to SGT (short for Safeguarding Team) on EBS on the Learners Details tab should be added and the safeguarding team should be informed so that any support needs or safeguarding considerations are not missed.

### **Allegation of Learner on Learner Abuse including Sexual Violence or Sexual Harassment**

SAL will record, investigate and deal with any allegation of learner on learner abuse including sexual violence or sexual harassment in an open and transparent manner following the usual reporting processes to external agencies where appropriate. SAL will support any affected adult at risk, young person or child in a manner appropriate to the situation regardless of whether they are the (alleged) perpetrator or victim. A risk assessment will be carried out to consider:

- The victim, especially their support and protection needs
- The (alleged) perpetrator, their support and any other needs
- Other learners
- The victim and (alleged) perpetrator sharing classes and public spaces at a SAL centre.

A member of the safeguarding team will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused. Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the advice of the police will be taken on whether the alleged perpetrator should be suspended from all or any of their courses. Where the investigation leads to a criminal conviction or caution, the



advice of the police will be taken on whether the perpetrator should be allowed to continue with their course or re-enrol on any future SAL courses.

- Any power imbalance between learners.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Where there is professional intervention and /or other specialist assessments, this information will be used to inform SAL's approach to supporting and protecting the learners.

## **Safeguarding Allegation against SAL staff or volunteer**

SAL recognises its primary concern is to ensure the safety of the adult at risk, young person or child. It has a duty to investigate the allegation, but SAL also has a duty of care to the staff member or volunteer. To minimise stress to the staff member or volunteer SAL will provide effective support for anyone facing an allegation and provide the staff member or volunteer with a named contact if they are suspended.

All allegations against staff members or volunteers will be reported to the Service Principal immediately. If the allegation is made against the Service Principal, the Chair of Governors or Safeguarding Governor will be informed as soon as possible. Where it is alleged that that the staff or volunteer has:

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

[Surrey's LADO procedure](#) will be followed.

All allegations will be investigated following the SCC Disciplinary policy to determine whether the allegation is:

Substantiated – i.e., there is sufficient evidence to prove the allegation.

False – i.e., there is sufficient evidence to disprove the allegation.

Malicious – i.e., there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false.

Unfounded – i.e., there is no evidence which supports the allegation. It might also indicate the person making the allegation misinterpreted the incident or was mistaken about what they saw.

Unsubstantiated - i.e., there is insufficient evidence to prove or disprove the allegation.

All allegations against a staff member or volunteer including the outcome of the investigation will be recorded in writing.

Guidance may be sought from SCC People and Change People Consultancy Team, the Surrey Safeguarding Adults Board, or the police where required.

If the allegation is substantiated, the staff member is dismissed or resigns or the volunteer's services are no longer offered or accepted by SAL, the DSL will take the SCC Safer Staffing Team advice on whether to refer the individual to the DBS for consideration of inclusion in the Barred Lists. If a criminal act is suspected, the DSL will notify the police.

If the allegation is determined to be unfounded or malicious, the DSL will refer the person who made the allegation to Adult Social Care or Children's Services (as applicable) to determine if the individual is in need of services.

If the allegation is shown to be malicious the DSL and Service Principal will decide if sanctions against the person who made the allegation are appropriate including whether or not to refer to the police.

In the case of a safeguarding allegation against a contractor working in a SAL centre or subcontractor, the allegation will be followed up with the contractor's Human Resources team or the subcontractor's DSL as applicable and the contractor or subcontractor's own procedures will apply.

It may be that an allegation is made, or a concern raised about a staff member or volunteer's actions which is not an allegation or concern of abuse or harm but is inappropriate conduct or unwise practise that does not meet a safeguarding threshold and/or is inconsistent with SAL's Staff and Volunteer Code of Conduct. These lower-level types of concern do not mean they are insignificant. They will be investigated by the DSL or Service Principal who may delegate to an appropriate line manager. Where appropriate the SCC Performance Capability Policy will be followed. Any concern, and the actions taken, will be recorded in writing.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which SAL's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff and volunteers.

## **Safeguarding Allegation against a Governor**

If an allegation is made against a Governor, the Service Principal and the Chair of Governors or Safeguarding Governor (as appropriate) will be informed as soon as possible. All allegations will be investigated following the SCC Disciplinary policy as above. If the allegation is substantiated, the procedure to consider removing them from office will be followed.

## **Reporting an adult safeguarding concern to the police**

If a crime has been or may have been committed, the SAL safeguarding team will seek the person's consent to report the matter immediately to the police. This may be in addition to raising a safeguarding concern with any other external organisation.

If the person has mental capacity in relation to the decision and does not want a report made, this should be respected unless there are justifiable reasons to act contrary to their wishes, such as:

- the person is subject to coercion or undue influence, to the extent that they are unable to give consent,
- there is an overriding public interest, such as where there is a risk to other people
- it is in the person's vital interests (to prevent serious harm or distress or in life-threatening situations)

There should be clear reasons for overriding the wishes of a person with the mental capacity to decide for themselves. A judgement will be needed that takes into account the particular circumstances.

If the person does not have mental capacity in relation to this decision, a 'best interests' decision will need to be made.

## **Staff concerns about SAL's safeguarding practices**

All staff and volunteers should feel able to raise concerns about any poor or unsafe practice and potential failures in SAL's safeguarding provision with the DSL and feel confident that such concerns will be taken seriously.

If a staff member or volunteer feels unable to raise an issue with the DSL or feels that their concern is not being taken seriously, they can contact the Service Principal or Safeguarding Governor. A concern can also be raised with SCC's Head of People and Change or confidentially using the external whistle blowing service. Details are available on [Whistleblowing \(sharepoint.com\)](#)

## **Disclosure and Barring Service checks**

Whilst teaching adults is not a regulated activity under the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012, the following staff and volunteer roles are subject to an Enhanced DBS (without Barred List) check because they involve working with or volunteering with children, young people or adults at risk, often in an unsupervised capacity or on school premises and were within the definition of regulated activity before 10 September 2012:

- All curriculum managers, assistant curriculum managers, tutors and supported learning assistants working on the Supported Learning\*, Family Learning and Passport to Wellbeing programmes;
- All volunteers supporting on the above three programmes;
- The Apprenticeship Manager together with any staff or volunteer working with an apprentice under the age of eighteen within the apprenticeship programme.
- Any curriculum managers, assistant curriculum managers, tutors, supported learning assistant and volunteers working to widen participation by providing, teaching or supporting bespoke courses specifically for adults:

- With a physical or learning disability or mental health condition affecting everyday life.
- Who are migrants, asylum seekers or refugees.
- Homeless or dealing with an addiction.
- Former looked after children.

(\* not Lip Reading)

Where a learner on either a Supported Learning or Family Learning course is under the age of eighteen the tutor, and where applicable, Supported Learning Assistant will be subject to an Enhanced DBS with Child Barred List Check.

Staff and volunteers working in the above identified programmes who have a break in teaching or supporting of twelve calendar months or more will require a new DBS Check to be made.

In keeping with SCC practice, a new Enhanced DBS Check will be submitted for all staff and volunteers in the above identified programmes every three years.

All other staff and volunteers not in scope for an Enhanced DBS Check are required to have a Basic DBS Check as part of their recruitment. A new Basic DBS Check will be required for any staff or volunteer who has a break in teaching or supporting of twelve calendar months or more.

Where a staff member or volunteer is dismissed or redeployed following a safeguarding incident, or a person leaves their role (resignation, retirement) to avoid a disciplinary hearing following a safeguarding incident and the Service Principal feels they would have dismissed the person based on the information they hold, the Service Principal or DSL will take advice from Surrey County Council's People and Change team on whether there is a legal duty to refer to the Disclosure and Barring Service even though the staff member or volunteer are not in Regulated Activity.

### **Staff and Volunteer duty to inform**

All staff and volunteers have a duty to inform the Service Principal of the following:

- Any involvement with the Police, such as being interviewed, questioned, subject to a court order, bound over, received a reprimand, warning, cautioned or convicted before or during their employment with SAL.
- Where a child for whom they have parental responsibility is being assessed or who has been placed on a Child In Need plan under Section 17 or a Child Protection plan under Section 47 of the Children Act 1989.
- Of any medical condition and/or medication or any other substances being taken on a regular basis that could affect their ability to work with children, young people or adults at risk.

Should the Service Principal be involved in any of the above circumstances, they should inform the SAL Safeguarding Governor.

The Service Principal or Safeguarding Governor together with the DSL will determine how to proceed and if necessary, take advice from the Police, Adult or Children's Social Care or SCC HR department as appropriate.

## **Guidance for SAL staff and volunteers**

### **Safeguarding Staff and Volunteer Code of Conduct**

All staff and volunteers must adhere to the SAL Staff and Volunteer Safeguarding Code of Conduct (Appendix 1).

### **Whistleblowing**

Any member of staff or volunteer who has concerns about any wrongdoing, which could include alleged abuse or neglect (including a low-level concern), by a colleague must refer to and follow the SCC Whistleblowing policy.

### **Making Safeguarding personal - 'No decision about me, without me'**

Where an adult at risk, young person or child discloses actual, or the risk of, abuse including radicalisation or neglect their wishes and feelings must be considered. They must be the centre of any safeguarding response and must be involved in the decision-making process as much as possible. They must be given the information and support necessary to consider options and make decisions.

### **Confidentiality**

The sharing of information about an adult at risk, young person or child can occur with SAL staff who need to know or with other agencies/organisations. Sharing information is essential to keep adults at risk, young person and children safe, help prevent further abuse or neglect and to ensure appropriate support is received and services accessed.

For this policy confidentiality does not mean secrecy and the adult at risk, young person or child making the disclosure or reporting the concern must be made aware that the information given will be passed on to the safeguarding team who may take a course of action. The safeguarding team will always bear in mind the wishes of the adult at risk, young person or child.

Members of staff or volunteers must not promise to keep anything secret and should always ask if information can be passed on to someone else. If consent is given by someone who has mental capacity to give consent, there is no breach of confidence.

Sometimes an individual is unwilling or unable to consent to information sharing. All members of staff and volunteers must be prepared to exercise their own judgement because whilst the wishes of the individual must be respected there is also a duty of care to report concerns. Each situation must be assessed individually as a referral may still be justified e.g.

- A person's life is in danger, or their health is at risk
- There is a danger to other people or the community
- A serious crime has been committed
- An individual does not have the mental capacity to consent

The Data Protection Act 2018 and UK General Data Protection Regulation (GDPR) do not prevent or limit the sharing of information in a safe and secure manner for the

purposes of keeping the adult at risk, young person or child safe and receiving the support they need. If in doubt about sharing information staff or volunteers should speak to the SAL safeguarding team who will have due regard to data protection principles which allow the sharing of information.

## **Dealing with a disclosure**

If a person tells a staff member or volunteer about something that has happened, that member of staff or volunteer's role is to respond sensitively and pass the information on. The person disclosing the information may be asking for help but sometimes they may not appreciate the significance of what they are saying, or they may not construe the actions of another as harmful or unusual.

The staff member or volunteer should:

- Consider the safety of the person and any others. If there is immediate danger contact the relevant emergency service
- Stay calm –not appear shocked or upset
- Listen carefully
- Show concern and interest in what is being said
- Be sympathetic
- Tell the person that they were right to talk, what is being said is being taken seriously and will be passed to the Safeguarding team
- Tell the person what will happen next and where possible let the person know as soon as it has been done. Reassure them that they will be involved in decisions about what will happen next
- Only ask open questions:
  - What happened?
  - Where did it happen?
  - Who was involved/who was there?
  - When did it happen?
  - What do they want your involvement to achieve? (How can we make a difference)
- If possible, make very brief notes at the time and write them up fully as soon as possible. Keep to the exact facts (not own thoughts or ideas) that have been disclosed. Include the views and wishes of the individual if possible.
- Preserve any evidence.
- Follow SCC Whistleblowing procedures, if relevant.

The staff member or volunteer should not:

- Ask probing or leading questions or push the person to reveal more details.
- Ask the person why something has happened.
- Stop the person talking once they have started to disclose.
- Promise to keep secrets.
- Make promises that cannot be kept.
- Contact or talk to the person alleged to have caused the abuse or neglect.
- Be judgemental.
- Pass on information other than to those who need to know in order to keep the learner safe and deal with the safeguarding issue.

## Written Records

Recording allegations, disclosures and/or suspicion of abuse.

It is recommended that the [SAL Safeguarding Reporting Form](#) is used to report all safeguarding concerns and disclosures.

Be brief, factual and include:

- The details of what you were told and/or saw including dates, times and actual events.
- What the person actually said - in their own words if possible.
- The wishes of the individual – what they would like to happen next.
- Use clear straightforward language, avoiding abbreviations.
- Do not include your opinions, ideas or assumptions.
- Describe where you were when you were told and /or what you saw, heard etc.
- Record the name(s) of who you were talking to and their date of birth if possible and who else was there.
- Record whether the person is aware that the concerns have been reported.
- Record the date and time you wrote the note.

Remember what you record may be used in evidence.

## Mental Capacity

Central to mental capacity legislation are five principles:

- **Principle 1:** Every adult has the right to make their own decisions and must be assumed to have capacity to do so unless it is proved otherwise. Do not assume that someone cannot decide for themselves just because they have a particular medical condition or disability.
- **Principle 2:** Make every effort to encourage and support people to make the decision for themselves. If lack of capacity is established, it is still important to involve the person as far as possible in decisions made.
- **Principle 3:** People have the right to make what others might see as an unwise decision.
- **Principle 4:** If a person has been professionally assessed as lacking capacity, an action taken or decision made for, or on behalf of that person, must be made in their best interests.
- **Principle 5:** Someone making a decision or acting on behalf of a person who lacks capacity must consider whether it is possible to decide or act in a way that would interfere the least with the person's rights and freedoms of action. This might mean not making a decision or deciding to act at all.

## Repeat or prolonged unexplained learner absence

All learner absences are managed in accordance with the current SAL Managing Learner Attendance Policy and Guidelines. Where there is a concern that a child, young person, adult at risk or any other learner for whom a safeguarding concern has been noted on SAL's management information system is repeatedly absent from

their course or has a period of unexplained prolonged absence of more than four weeks, a member of the safeguarding team should be informed.

## **Children or Young People on site**

Children or Young People under the age of eighteen should not be on site in any SAL Adult Learning Centre unless they are:

- enrolled on a course within Family Learning or the Supported Learning programme (as part of a link programme with their special educational needs school) or
- enrolled on the Apprenticeship programme or
- attending an event or meeting organised by a person or organisation who has hired a room or the centre in accordance with SAL's Centre Hire, Lettings and Offsite Venue Policy

In particular, no child of an enrolled learner should be permitted to attend a class with their parent, carer or guardian or be left unsupervised on site at any Adult Learning Centre or outside venue being used by SAL.

## **Speakers and Events**

Any staff member wishing to use or facilitate an external speaker or group who will meet with learners, must first complete due diligence by following SAL's External Speakers Policy.

## **Room Hire**

Any organisation or individual hiring a room at a SAL adult learning centre to provide services or activities must have appropriate safeguarding and child protection policies and procedures in place and comply with SAL's Centre Hire, Lettings and Offsite Events policy.

## **Contractors and Visitors**

Centre staff should always check the identity of any contractor or visitor coming to an adult learning centre in their professional capacity, on arrival as part of the signing-in process.

At times when there are adults at risk, children or young people in an adult learning centre:

1. All SCC approved contractors are required to have an Enhanced level DBS check. Centre staff should check evidence of this when the contractor arrives at an adult learning centre.
2. Any other contractor or visitor arriving at a centre in their professional capacity must be accompanied at all times by a member of centre staff if they cannot provide evidence of a DBS check at any level.

Other visitors such as members of the public using a centre café or learners adult relatives or support workers are not required to show identity documents. The centre staff will use their professional judgement about the need to challenge an unknown person in a centre.

## **Summary of SAL Safeguarding Procedures**

Is the adult at risk, young person or child in immediate danger or in need of medical attention?



Has a crime been committed or in progress

If no, , make sure the person is safe.

Report concerns to one of SAL's safeguarding team within 4 hours **or** other appropriate agency if SAL's safeguarding team are not available/ it is outside the normal working day. Inform the SAL Safeguarding Team the next working day

SAL safeguarding team to manage any support for the adult at risk, young person or child internally or report to appropriate agency, record actions and outcome.

**If yes**, contact 999 for police and/or ambulance.

Report concerns to one of SAL's safeguarding team within 4 hours **or** other appropriate agency if SAL's safeguarding team are not available/ it is outside the normal working day. Inform the SAL Safeguarding Team the next working day

Report concerns to one of SAL's safeguarding team within 4 hours **or** other appropriate agency if SAL's safeguarding team are not available/ it is outside the normal working day. Inform the SAL Safeguarding Team the next working day

SAL safeguarding team to manage any support for the adult at risk, young person or child internally or report to appropriate agency, record actions and outcome

### **3. Safer Recruitment Policy**

#### **Purpose**

To ensure:

1. Applicants who may wish to harm adults at risk, children or young people are deterred from applying for jobs or volunteering opportunities.
2. Any unsuitable applicants are rejected by scrutinising applications and exploring potential areas for concern at interview.
3. Unsuitable appointments are not made by having at least one member of the interview panel trained in safer recruitment; carrying out all relevant pre-employment checks and ensuring all new staff and volunteers are given an appropriate induction.
4. Any risks are identified and managed, if necessary.
5. A safe and vigilant culture is maintained.
6. All subcontractors and partner organisations provide a safe learning and working environment for all learners.
7. SAL staff who carry out a recruiting role are provided with guidelines for safer recruitment.
8. A system is in place for early identification of potential safeguarding needs of learners at the point of enrolment onto courses.

#### **Staff Recruitment**

##### **Training for Recruiters**

At least one member of the interview panel must have completed SCC's safer recruitment training or equivalent.

Any queries by SAL managers or staff who carry out a recruiting role should be referred to the SCC Safer Recruitment Team for advice.

## **Disclosure and Barring Service (DBS) Checks**

The SCC e-DBS procedure for those SAL posts and roles identified below as requiring an Enhanced DBS check must be followed.

If a staff member or a volunteer needs to commence in one of the identified roles or posts before the Enhanced DBS disclosure is received, the SCC risk assessment process must be followed.

### **Rationale for posts requiring an Enhanced Disclosure and Barring Service (DBS) Check:**

Within SAL the roles requiring an Enhanced DBS (but without a Barred List) Check are:

- All curriculum managers, assistant curriculum managers, tutors and supported learning assistants working on the Supported Learning\*, Family Learning, and Passport to Wellbeing programmes
- All volunteers supporting on the above three programmes
- The Apprenticeship Manager together with any staff or volunteer working with an apprentice under the age of eighteen within the apprenticeship programme.
- Any curriculum managers, assistant curriculum managers, tutors, supported learning assistant and volunteers working to widen participation by providing, teaching or supporting bespoke courses specifically for adults.
  - With a physical or learning disability or mental health condition affecting everyday life.
  - Who are migrants, asylum seekers or refugees.
  - Homeless or dealing with an addiction.
  - Former looked after children.

(\*not Lipreading tutors)

All staff and volunteers working in the Supported Learning, Family Learning and Apprenticeship programmes will have a Child and Adult Workforce check because learners under the age of eighteen may engage in these programme areas.

Where a learner aged 16-17 years enrolls either on a Family Learning course because they are a young parent or on a Supported Learning course as part of a link programme with their SEN school, the tutor and any SLA or volunteer will require an Enhanced DBS check with Child Barred List.

The rationale for these roles being subject to an Enhanced DBS check is that they involve working with or volunteering with children, young people or adults at risk, often in an unsupervised capacity and/or on school premises and were within the definition of a regulated activity before 10 September 2012.

As part of recruitment if the applicant is being recruited to a role requiring an Enhanced DBS Check and has lived or worked outside the UK within the last 5 years a Certificate of Good Character must be provided by the applicant from the relevant embassy in the UK following the current Home Office advice on the [gov.uk website](http://gov.uk)

unless, within the last 3 months before starting to work for SAL, the new staff member has worked in:

- A school in England in a position that regularly brought them into contact with children or
- Another institution within the FE sector in England, or a 16-19 Academy, in a position which involved the “provision of education and caring for, training supervising or being solely in charge of persons under the age of 18.”

In keeping with SCC practice, a new Enhanced DBS Check will be submitted for all staff and volunteers in the above identified programmes every three years.

For staff not in scope for an Enhanced DBS check, a Basic DBS Disclosure will be obtained as part of the recruitment process. If it is essential that a member of staff needs or a volunteer needs to start working for or volunteering with SAL before the Basic DBS disclosure is received, the SAL risk assessment process must be followed.

Where a staff member or volunteer has a break in actively working for SAL of twelve calendar months or more, a new DBS Check must be made, and the resulting Disclosure received (or a SCC risk assessment to be in place) before resuming work.

### **Safeguarding training**

On appointment all new staff and volunteers are to complete the required Safeguarding and Prevent training as part of recruitment. Mandatory refresher Safeguarding and Prevent training must be completed as required.

### **Working with External Providers**

Any provider contracted to deliver learning as part of subcontracting arrangements will be contractually required to work to the SAL current Safeguarding and Safer Recruiting policies – copies of which will be provided with the Framework contract. Prior to the signing of the contract as required by the Education and Skills Funding Agency rules associated with Adult Education Budget, SAL will complete the Due Diligence process. The sub-contractor will also be required to report on Safeguarding concerns and disclosures at regular intervals to be agreed with the sub-contractor.

Any employer, partner or organisation working with SAL on an apprenticeship programme will be expected to commit to safeguarding and promoting the wellbeing of any young person or adult at risk entering employment with training by working to the current SAL Safeguarding and Safer Recruitment policies.

SAL will take all reasonable steps to support and monitor any apprenticeship programme partner or subcontractor to ensure it meets the following standards:

1. Safer recruitment is practiced in checking the suitability of staff and volunteers.
2. Awareness of what constitutes a safeguarding concern is understood by all staff and volunteers.
3. All staff and volunteers are clear about their responsibilities to safeguard learners.

4. Robust procedures are in place to record and report all safeguarding concerns (including Prevent).
5. A safe learning or working environment is created so learners can thrive and achieve; staff, volunteers and learners feel safe, and everyone knows that their wellbeing is a high priority.
6. Learners, including apprentices, know how to report safeguarding concerns.
7. A Safeguarding Staff and Volunteer Code of Conduct is available.
8. All safeguarding training is appropriate and complies with the SAL Safeguarding and Safer Recruitment policies.

Any individual delivering learning or training on behalf of SAL will be required to possess a DBS Disclosure at the same level as the Service requires its own staff to be DBS checked.

### **Guidelines on Safer Recruiting in the Recruitment and Selection of new SAL staff or the placement of a SAL Volunteer**

SAL follows the SCC Safer Employment and DBS policy.

Advertising a post or volunteering opportunity:

1. All adverts will include a clear commitment to safeguarding and state that appropriate checks will be made.
2. Clearly state when an Enhanced DBS disclosure is required.
3. Refer to up-to-date job descriptions and person specifications
4. Clearly state that online searches may be carried out on applicants who are shortlisted for interview.

#### Applications:

The SCC online application process will be followed including completion of a full application form. A curriculum vitae can be submitted as an optional extra.

Checks before invitation to interview will include scrutinising any gaps in employment and reasons for leaving employment, which will be followed up at interview.

The potential value of online searches on applicants shortlisted for interview to avoid recruiting anyone unsuitable to work with vulnerable adults, young people or children and/or who could cause reputational damage to SAL is recognised. SCC People and Change team (in consultation with other relevant corporate teams) are considering how best to approach protocols for online searches which will support other pre-employment checks, and their decision is awaited.

#### Interview:

It is preferred that all interviews are face-to-face, but where this is not possible a video conferencing platform must be used.

1. At interview the interviewing panel will:
  - a. Explore where any information appears to be incomplete.
  - b. Explore gaps in employment history and where needed reasons for leaving employment.

NOTE – Just giving the years at a place of employment is insufficient. There is a need to probe deeper in case there are unexplained gaps in employment history that raise safeguarding concerns however, if the reason given for any gaps relate to a health condition or disability, this should not be explored further at interview.

2. It is legitimate to ask candidates about any previous declared “unspent” convictions.
3. Initial questions about safeguarding should not be hypothetical as candidates may only give hypothetical answers which may not show their attitudes and motives towards working with adults at risk, children or young people.
4. Follow-up probing safeguarding questions should not be generic but contextualised to the post or role.
5. Discussions about information discovered from any online search of publicly available sources may become a requirement depending on the corporate People and Change team decision about online searches for SCC staff.

#### Document Checks:

At interview check and verify the candidate’s

- Identity
- Eligibility to work in the UK
- Professional qualifications where applicable

Ensuring that all documents are valid, current and original.

#### References

1. At least two references must be provided covering the last three years which includes one from the most recent previous employer.
2. For staff first line approval/verification of references and other pre-employment checks will be by the SCC Recruitment Team
3. Check that references from a previous employer are from a line manager and not a former colleague.

4. Do not accept open references or references that are unsigned or undated.
5. If a reference does not give all the information requested, the referee must be contacted by telephone and a written record made of what is said.
6. References received by email must be sent from an official organisation email address.

## **Learner Recruitment**

To assist the early identification of potential learner safeguarding needs at the time of enrolment:

1. On universal programme courses – If a learner makes a disclosure at enrolment which could increase the risk of a safeguarding concern, this will be recorded and the safeguarding team will be notified as detailed in the Guidelines for Enrolling Learners with Additional Needs and Young People.
2. On Family Learning, Supported Learning and Passport to Wellbeing courses and on the Apprenticeship programme – the Curriculum Manager, Assistant Curriculum Manager or Apprenticeship Manager will advise the safeguarding team of any learners with any disclosed additional need or wellbeing concerns which could increase the risk of safeguarding issues and the safeguarding team will liaise with the course tutor or tutor-assessor as required.

To enable ongoing care and support to be given to any learner open to the safeguarding team who is leaving or completing their course of study with SAL, the safeguarding team will request the Customer Service Team add a note on the Management Information System (MIS) flagging that the safeguarding team must be advised if the learner is being withdrawn from or completing their course. This will enable the team to consider any ongoing safeguarding needs or concerns can take place.

When the Safeguarding case is closed, the safeguarding team will advise the Customer Service Team to cancel the note on the MIS.

## **Related Policies and Guidelines**

### **SCC**

Safer Employment and DBS

Whistleblowing

Health, Safety and Welfare

Ending Harassment, Bullying, Discrimination and Victimisation

Domestic Abuse

Capability

Disciplinary

Grievance

Code of Conduct.

Internet Acceptable Use

IT Security

### **SAL**

E-Safety

Acceptable Use of Computers, Tablets and Mobile Devices

Unacceptable Behaviour and Conduct Policy and Procedure

Distance Learning

Guidelines for Enrolling Learners with Additional Needs & Young People Home Working

Centre Hire, Lettings and Offsite Events

External Speaker

Learner Charter

Managing Learner Attendance Policy and Guidelines

# Appendix 1 - Staff and Volunteer Safeguarding



## Code of Conduct 2024-25

Please note:

- Staff and volunteers **should not** spend excessive amounts of time alone with adults at risk, young people or children. Any unavoidable unaccompanied meetings with individual adults at risk, children or young people should take place within the sight of others where possible. If privacy is needed, the door should remain open and where possible other staff should be aware of the meeting.
- Staff and volunteers are **advised not to** make unnecessary physical contact with adults at risk, young people or children. **Always** seek permission before touching anyone.
- Staff and volunteers are **advised not to** make/accept any learners as friends on social media sites.
- Staff and volunteers are **advised not to** give learners their personal phone numbers or join WhatsApp groups with learners. Where WhatsApp is used for teaching purposes:
  - tutors choosing to give learners their personal mobile phone numbers do so at their own risk.
  - learners must be advised that once they join a WhatsApp group their mobile phone number is available to the other group members.
  - tutors should advise their line manager that they are using WhatsApp.
  - Wherever possible tutors should use the WhatsApp Broadcast option, so learners do not receive each other's mobile phone numbers.
- **Do not** take learners in your car.
- **Do** support SAL's zero tolerance approach to abuse including learner on learner abuse. Never pass off unacceptable or offensive comments of any kind as banter or 'just having a laugh'.
- Ensure consent forms are signed when taking photos or videos of any learners.
- Staff and volunteers should use SAL IT equipment wherever possible. Where personal equipment is used by a tutor:
  - any learner images or information must be stored securely using the SCC One Drive. Where this is not possible confidential files must be stored on personal equipment where it cannot be accessed by family or friends and
  - All images and information stored on a personal equipment should be deleted when no longer required but no later than at the end of the course.
- Ensure you know the current SAL Acceptable use of Computers, Tablets and Mobile Devices guidelines.
- Staff and volunteers **should not** arrange to meet adults at risk, children or young people outside the work environment without the approval of their line manager.
- Visiting speakers must not be left unaccompanied with learners.
- **Do not** start an investigation or question anyone after a safeguarding allegation or concern has been raised. Staff and volunteers should record the facts and report in line with SAL safeguarding procedures.
- Staff and volunteers must **never** (even in fun) –
  - Initiate or engage in sexually provocative conversations or activity
  - Allow the use of inappropriate language to go unchallenged



- Do things of a personal nature to or for adults at risk, young people or children that they can do themselves
- Allow any allegations to go without being reported
- Trivialise or exaggerate young person, child or adult at risk abuse issues
- Make promises to keep any disclosure confidential.
- **Do not** show favouritism to any one adult at risk, young person or child. If a learner appears to develop an infatuation with you, don't encourage it and report the situation to your line manager.

You must:

- Respect the rights of adults at risk, young people or children to privacy and encourage them to feel comfortable enough to report attitudes or behaviour that they do not like.
- Act with discretion with regard to your personal relationships and declare any pre-existing relationship with an adult at risk, young person or child.
- Ensure you are aware of the SAL procedures for reporting concerns or incidents including any nagging doubts about the safety or welfare of an adult at risk, child or young person and be familiar with the contact details of the safeguarding team.
- Make your line manager aware if you become the subject of inappropriate attention or affection from an adult at risk, young person or child.
- Report in line with SAL safeguarding procedures any concerns about the wellbeing of an adult at risk, young person or child including unexplained repeat or prolonged period of absence of more than four weeks.

All staff and volunteers have a duty to inform the Service Principal of the following:

- If you have been involved with the Police, such as interviewed, questioned, subject to a court order, bound over, received a reprimand, warning, cautioned or convicted before or during your employment with SAL.
- If you have parental responsibility for a child who is being assessed or who has been placed on a Child In Need plan under Section 17 or a Child Protection plan under Section 47 of the Children Act 1989.
- If you have a medical condition and/or are taking any medication or any other substances on a regular basis that could affect your ability to work with children.

Should the Service Principal be involved in any of the above circumstances, they should inform the SAL safeguarding governor.

All staff and volunteers should raise any concerns about poor or unsafe practice in SAL's safeguarding management or process with the Service Principal and/or the SAL safeguarding governor.

## **Procedure for responding to an allegation of abuse or low level concern**

The SAL procedure detailed in the current SAL Safeguarding Policy must be followed whenever there is an allegation that an adult at risk, young person or child is experiencing, or at risk of, abuse or neglect.

Do not make promises about confidentiality. Explain to the person at the outset that you will need to report the disclosure and share the information with the safeguarding team who will, where possible respect the wishes of the learner. Where there is judged to be a justifiable need the information will have to be shared with external agencies.

If an allegation of abuse is made against a member of SAL staff or volunteer, the procedures set out in the SAL Safeguarding policy will be followed.

If a low-level concern is raised that member of SAL staff or volunteer's behaviour is unprofessional or inappropriate, the procedures set out in the SAL Safeguarding policy will be followed.

All staff and volunteers are encouraged to self-refer to the DSL or Principal if they have found themselves in a situation which could be misinterpreted as abuse, neglect, unprofessional or inappropriate.

## **Appendix 2 Sexual Violence and Sexual Harassment**

### **Sexual violence**

It is important to recognise that sexual violence and the fact learners including children can, and sometimes do, abuse others in this way can happen both inside and outside of SAL.

When referring to sexual violence this refers 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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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

### **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 s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

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

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent.](#)

## **Sexual harassment**

Sexual harassment means ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of SAL. Sexual harassment is likely to: violate a learner’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. Settings should be considered when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
  - sharing of unwanted explicit content
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats, and
  - coercing others into sharing images of themselves or performing acts they’re not comfortable with online.

It is important that all staff consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

## **Consensual and non-consensual sharing of nude and semi-nude images/videos**

If a learner under the age of 18 creates and/or shares a nude or semi-nude imagery (also known as sexting) the primary concern will be the welfare of the child. Depending on the age of the child consensual image sharing may not be abusive but it is illegal. Non-consensual image sharing is illegal and abusive.

The safeguarding response will be proportionate to the situation. If however, an adult or child under the age of 13 is involved, the response will include an immediate referral to the police and children’s social services.

## Appendix 3 - Safeguarding Training Guidance 2024-2025

The mandatory training requirements are:

Employee Classification	SG Initial Awareness (MS Form) as part of recruitment	Prevent - as part of recruitment & to be refreshed every 2 years * (see section below)	SG Refresher-(on Moodle) 2 years after recruitment and every 2 years thereafter	Safer Recruitment
<b>Teams - SMT, IT, Learning Services, Business Development</b>	Yes	Yes, online	Yes Moodle	Yes (where applicable)
<b>CMs, AsCMs Apprenticeship Manager</b>	Yes	Yes, online	Yes Moodle	Yes
Success Indicator	90% pass	Certificate	80% pass	Certificate
<b>Tutors, Trainer-Assessors</b>	Yes	Yes online	Yes Moodle	No
<b>SLAs</b>	Yes	Yes online	Yes	
Success Indicator & Payment	90% pass Nil	Certificate Nil on recruitment; 1 hour for refresher *	80% pass 1 hour	No
<b>Self employed Tutors (Visiting Lecturers/ Vendor Tutors)</b>	N/A (no longer recruiting to this role)	Yes Briefing paper	Yes Briefing paper	No
Success Indicator & Payment	N/A	Signature or email confirmation 30 minutes	Signature or email confirmation 30 minutes	No
<b>Café Supervisors, Caretakers, Technicians, Invigilators, IQAs</b>	Yes	Yes Briefing paper	Yes Initial	No
Success Indicator for all; payment for technicians, invigilators and IQAs only	90% pass Nil	Signature or email confirmation Nil on recruitment 30 minutes for refresher	90% pass 30 minutes	No
<b>Volunteers</b>	Yes	Yes Briefing paper	Yes Briefing paper	No
Success Indicator	90% pass	Signature or email confirmation	Signature or email confirmation	No
<b>Models</b>	Yes, Briefing paper	Yes Briefing paper	Yes Briefing paper	No
Success Indicator & Payment	Signature or email confirmation Nil	Signature or email confirmation Nil on recruitment 30 minutes for refresher	Signature or email confirmation 30 minutes	No

Please note the following:

- ALL staff will receive Keeping Children Safe in Education part 1 or Annex A together with the SAL Safeguarding Code of Conduct at the start of each academic year or at the recruitment stage if staff join during the academic year.
- Staff working with children will also receive Annex B.
- ALL staff and volunteers are expected to commit to SAL Safeguarding training regardless of the hours they work and other safeguarding training they may have undertaken.
- The Safeguarding Initial Awareness and Prevent training are an integral part of the recruitment process for all staff and volunteers and is not paid.
- Nationally recognised Prevent training completed within the last year for another employer is likely to be accepted. Please check with Designated Safeguarding Lead.
- Where the success indicator is 'signature' in the table, email confirmation is acceptable.
- Tutors should not be assigned new teaching if their mandatory Safeguarding including Prevent and EDI training is not up to date.
- Curriculum Support will monitor compliance with mandatory Safeguarding and Prevent training and will provide non-compliance reports to the Designated Safeguarding Lead, curriculum teams, Apprenticeship Manager and Learning Services Manager; they update training records and arrange payment where applicable.

## **Prevent training**

SAL uses the [Online Prevent Training](#) and [Prevent refresher training](#)

Upon completion of Prevent refresher training send Curriculum Support a copy of certificate; who will update training record and action payment for 30mins.

\*Where the Prevent refresher date coincides with the SG refresher training date then Prevent training will be covered within the SG refresher module so separate Prevent training is not required. In this instance payment of 1 hour will be for SG refresher training.

**Prevent briefing paper** is to be read; confirmation of understanding to be sent to Curriculum Support who will action payment (for 30 minutes if applicable) and update training record when this has been completed as Prevent refresher training.