

# Safeguarding & Prevent policy



| Key information                |                              |
|--------------------------------|------------------------------|
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## Scope

Petty Pool is dedicated to safeguarding and promoting the welfare of everyone we come into contact with, particularly children and adults at risk, in accordance with the Children's Act 1989 and the Care Act 2014.

This policy applies to all our staff, managers and leaders. It is also shared with the employers we work with and those we subcontract with. It is our aim to make this policy highly visible and accessible, and for this reason we have published this policy on our website.

Who this policy applies to:

This Policy applies to ALL individuals associated with the Trust, all of whom have a responsibility for the protection of Vulnerable Adults and Children.

- Board of Trustees of Petty Pool
- Chief Executive Officer of Petty Pool
- The Senior Management Team of Petty Pool
- All tutors and non-teaching staff (including those who are supply, volunteers and freelance)
- All Students and Members who access any provision offered by the Trust
- All professionals who work with Students and Members

## Policy Statement

Our statutory duty is to safeguard and promote the welfare of our learners whilst in learning, in work, at home and within their communities.

We aim to ensure that our safeguarding practice complies with government guidance and with best practice, including the Children Act 1989 and 2004, the Care Act 2014, Working Together to Safeguard Children 2022, Keeping Children Safe in Education 2023 and the Education and Training (Welfare of Children) Act 2021. We will take a zero-tolerance approach to all types of abuse and encourage all of our staff to take the view that it may happen in our setting.

We will also seek to keep learners safe by:

- valuing, listening and respecting them
- appointing Designated Safeguarding Leads and adopting child protection and safeguarding practices through procedures and a Code of Practice for staff
- developing and implementing an E-safety Policy and procedures
- providing effective management for staff through appraisals, support, training and quality assurance measures
- recruiting staff safely and ensuring all necessary checks are made
- recording and storing information professionally and securely
- sharing and promoting the knowledge, understanding and application of guidance about safeguarding and good practice with children, adults at risk, their families and staff.
- using our safeguarding procedures to share concerns and relevant information with agencies including the DBS who need to know, and, where relevant, involving parents, families and carers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place ensuring that we provide a safe place by applying health and safety measures in accordance with the law and regulatory guidance

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children 2022 as:

- protecting children from maltreatment

- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

We recognise that some young people, including disabled children and adults at risk, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their safety and promote their welfare.

As part of our Safeguarding and Prevent policy we will:

- promote and prioritise the safety and wellbeing of all learners
- sustain and grow a positive culture of support, concern and inclusivity within the organisation so that our safeguarding arrangements flourish and remain highly effective.
- identify those most at risk through their vulnerability or other circumstances and provide targeted support
- listen to learners and take account of their wishes and feelings
- make sure that everyone understands their roles and responsibilities in respect of safeguarding, and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns
- ensure appropriate action is taken in the event of incidents and/or concerns of abuse and support provided to the individual/s who raise or disclose the concern
- take care that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- prevent the employment/deployment of unsuitable individuals
- ensure robust safeguarding arrangements and procedures are in operation
- To provide fair and equal opportunity for all students and members in a safe and secure environment

The policy and procedures will be widely promoted and are mandatory for everyone within Petty Pool Trust. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal.

We Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

We take steps to minimise any possibility of abuse or harm occurring, and make sure if a concern, allegation or disclosure arises it is dealt with quickly and appropriately.

Good links are maintained with the statutory safeguarding authorities such as the Safeguarding Children's Partnership (SCP) and Safeguarding Adults Partnership (SAP), and if we have significant concerns about the suitability of a member of staff or a volunteer to work with children or young people, we will refer to the Local Area Designated Officer (LADO) and/or Disclosure Barring Service (DBS).

Everyone within the Petty Pool Trust must fully understand and implement the safeguarding policies and procedures relevant to their role. To enable this to happen there is a comprehensive training programme and safeguarding structure that ensures we protect children and adults at risk across the organisation, including work placements and in the wider community.

## Legal Framework and Guidance (Children and Adults)

Children Act 1989/2004

United Convention of the  
Rights of a Child 1991 Data

Protection Act 1998/2018  
(GDPR)

Human Rights Act

1998 Sexual

Offences Act 2003

Mental Capacity

Act 2005

Safeguarding Vulnerable

Groups Act 2006 The

Education and Skills Act

2008

Apprenticeship, Skills, Children and

Learning Act (2009) Safeguarding

Disabled Children: Practice Guide

2009

Special educational needs and disability (SEND) code of practice: 0 – 25 years  
The Equality Act 2010  
Protection of Freedoms Act 2012  
Domestic Violence, Crime and Victims (Amendment) Act 2012  
Children and Families Act 2014  
The Care Act 2014  
Counter Terrorism and Security Act 2015  
Working together to safeguard children (2018)  
Voyeurism (Offences) Act 2019  
Prevent Duty Guidance 2015 (updated 2019)  
Keeping Children Safe in Education 2020 & (January 2021 Post EU exit update)  
Education and Training (Welfare of Children) Act (2021)  
Sexual Violence and Sexual Harassment between children in schools and colleges (2021)  
Domestic Abuse Act 2021

## Safer Recruitment, Selection and Training

Petty Pool will ensure that those involved in the recruitment and employment of staff have received safer recruitment training and that they are fully aware that they have a responsibility to refer to specific bodies if there are concerns regarding an individual

Petty Pool will keep learners safe by:

- thoroughly vetting all staff who work with learners
- taking proportionate decisions on whether to ask for any checks beyond what is required
- ensuring any volunteers are appropriately supervised
- having appropriate procedures in place for appointing staff

Safe recruitment and selection procedures help to ensure a safe workforce by deterring and screening out unsuitable individuals.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Working with Cheshire College South & West, we will maintain a Single Central Register of all safer recruitment checks carried out in line with statutory requirements.

*For further information, see staff Recruitment and Procedures policy*

## Induction for staff

The Senior Management Team have a responsibility to read and understand Part 1 of KCSIE (updated September 2023). They are now held ultimately responsible for ensuring that staff comprehend and discharge their roles and responsibilities and should consider “which guidance is most effective” in their organisation. This will give them the

opportunity to make sure that any staff with literacy needs or English as a Second Language have assimilated the statutory guidance.

All new employees will be given an induction programme which will clearly identify the policies and procedures, including the Safeguarding and Prevent Policy, the Code of Practice and KCSIE (updated September 2023), which will make clear the expectations that govern how they carry out their roles and responsibilities.

All new staff must complete the e-learning modules including Safeguarding, Prevent Duty and supporting learners with High Needs as part of their induction.

All staff will receive relevant safeguarding and Prevent induction training. The purpose of this induction training is to make sure they understand Petty Pool’s Safeguarding and Prevent Policy and procedures, and that they have up to date knowledge of the safeguarding issues identified in the Part 1 of KCSIE (updated September 2023). This includes early identification of radicalisation, exploitation (criminal, sexual or otherwise), child on child abuse, forced marriage, female genital mutilation (FGM), child mental health, online safety, whistleblowing and staff conduct. This training will enable them to understand and identify signs of abuse and learners who may be in need of help.

Further safeguarding and Prevent training covering statutory updates including managing disclosures and specific safeguarding issues is provided to all staff at least annually and as required.

Petty Pool staff will complete annual online Safeguarding Training and additional CPD internally run sessions and information sharing. It is also supplemented by Cheshire West & Chester Social Services and/or CCSW.

A full CPD/training calendar is kept alongside registers of attendance.

All staff will complete online safety training which includes an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

## Protection From Abuse

Abuse is a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or an institutional or community setting by those known to them or, more rarely, by others, for example via the internet. They may be abused by an adult, adults, another child, or children (KCSIE 2023). Some children have an increased risk of abuse both online and offline, and additional barriers can exist for some children with respect to recognizing or disclosing it. We are committed to anti discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they face.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are causing a problem by reporting abuse, sexual violence or sexual harassment, nor should they be made to feel ashamed that they have reported an incident.

The college plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing young people for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

One of the ways of preventing abuse is being aware and having knowledge of the indicators of different types of abuse in its various forms. Abuse can manifest itself in many different forms including peer on peer abuse that may involve bullying (including



cyber bullying), gender-based violence/sexual assaults and sharing nudes or semi-nude images/videos.

Staff should be clear as to the organisation's Safeguarding and Prevent Policy and procedures with regards to child-on-child abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Staff can access government guidance as required on the issues listed below via the NSPCC and GOV.UK and other websites.

## Managing allegations against other children (child on child abuse)

If an allegation is made by a learner about another learner including any abuse in intimate personal relationships, staff must consider whether the disclosure raises safeguarding and child protection concerns. If one learner causes harm to another it may not be abuse. However, learners at Petty Pool are considered vulnerable and therefore at higher risk of abuse by their peers. Such abuse will be taken seriously and not dismissed as 'part of growing up'. Additionally, it will be subject to the same child protection procedures as any other form of abuse. All child-on-child allegations must be referred to the DSL immediately.

## Reporting concerns, suspicions and allegations

What is a disclosure?

A disclosure is when a person tells you something that has affected them, for example about instances of current or historic abuse.

Any member of staff, who either knows, is told, or strongly suspects any incident of current or historic abuse, has a duty to report the information immediately to the DSL or Deputy DSL. In their absence, a member of Senior Management will be informed without delay.

Some things that may be shared with you include self-harm and physical, sexual or emotional abuse, and you may also notice signs of neglect. There may be a concern about something that has

happened online or through social media.

Talking about these things may be difficult to hear and tough to deal with. Following these Dos and Don'ts will help you offer the best support possible.

Do:

- remain calm, approachable and receptive
- listen carefully, without interrupting
- acknowledge you understand how difficult this may be
- make it clear that you are taking what is said seriously
- reassure them that they have done the right thing in telling you
- let them know that you'll do everything you can to help them
- make a written record of exactly what has been said
- consider what is known about the child/young person's wider context (Contextual Safeguarding)
- recognise that some learners may not feel ready to talk about their abuse

Don't:

- promise confidentiality
- ask leading or probing questions
- investigate
- repeatedly question or ask them to repeat the disclosure
- discuss the disclosure with people who do not need to know
- delay in reporting the disclosure to the Safeguarding team.

To report a concern:

- Make a written record of your concern, including the date, time and all relevant details of the person concerned, others involved and witnesses (if there are any)
- Contact your Designated Safeguarding Lead (DSL) or the Deputy (DDSL) who will inform you of the next actions to take
- Complete a safeguarding event log on Databridge and including all necessary information and tag the relevant people into the entry.
- If it is an emergency and the learner is at risk of immediate serious harm, inform the police or social services immediately. Inform the DSL as soon as practicably possible.

To report a low-level concern or observation contact your DSL to discuss and they will decide if any escalation is required. All low-level concerns will be recorded and monitored within Databridge.

Whistleblowing:

If the allegation or suspicion is about the conduct of a staff member, then this is to be recorded on Databridge as a 'high-level safeguarding concern'. This will only be visible to the Principal and the CEO. If the concern is about either the Principal or CEO, you will need to report your concern to the Chair of Trustees.

Allegations or suspicions about a member of staff will be reported to the Local Authority Designated Officer (LADO).

If the college receives an allegation relating to an incident where an individual or organisation was using the college premises for running an activity for children, you should follow your safeguarding policies and procedures and inform the local authority designated officer (LADO), as you would with any safeguarding allegation

## Local Authority Designated Officer (LADO)

Every local authority nationally will have a LADO and our Safeguarding Team will liaise with the relevant LADO in each area as necessary. This individual can provide the DSL with guidance following specific cases of concern where an individual has:

- behaved in a way that has harmed a learner, or may have harmed them
- possibly has committed a criminal offence against or related to a learner; or behaved towards a learner in a way that indicates s/he is unsuitable to work with young people.

The LADO will be informed within one working day of all allegations that come to our attention.

## DBS Referrals

The Petty Pool Trust has a legal duty to refer to the Disclosure and Barring Service (DBS):

- anyone who has harmed or poses a risk of harm to a young person or adult at risk

- the member of staff has committed one of a number of listed offences and has been removed from working (paid or unpaid) in regulated activity
- the member of staff would have been removed for the above had they not left the organisation

The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of our staff a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO or other statutory agency.

If there are any changes to their criminal record e.g. driving or other offences, employees are expected to update the organisation immediately. Any failure to disclose an offence, if discovered subsequently, will be/may be treated as a potential act of gross misconduct and could lead to disciplinary action.

## Gangs, County Lines, Serious violence, Crime and Exploitation

Petty Pool Trust recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to victims is important and that staff will be proactive with a “it could happen here” approach. They will take any allegation seriously and work in ways that support learners to keep them safe. All

staff have been trained and recognise the need to be vigilant for the signs that may include:

- Unexplained gifts/new possessions – these can indicate learners have been approached by/involved with individuals associated with criminal networks/gangs, this includes children and adults at risk
- Young people and adults at risk who go missing for periods of time or regularly come home late
- Young people and adults at risk who regularly miss training or do not take part in education
- Change in friendships/relationships with others/groups
- Young people and adults at risk who associate with others involved in exploitation
- Young people and adults at risk who suffer from changes in emotional well-being

- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

<http://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

## Safeguarding Structure

Our Senior Management Team have a responsibility to read and understand Part 1 of KCSIE (amended 2023). They are held ultimately responsible for ensuring that staff comprehend and discharge their roles and responsibilities including any staff with literacy needs or English as a Second Language.

The Principal/Deputy CEO has overall responsibility to make sure that all staff and learners are kept safe in line with current legislation, approved codes of practice (ACOP) codes of practice (COP) and other guidance.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead ensure that all activities on a day-to-day basis comply with the organisation's policies and procedures.

All staff ensure that they adhere to the relevant policies and procedures to keep all learners safe, and they must attend Safeguarding training and updates as agreed.

Legislation and government guidance make it increasingly clear of the need for all adults to play a role in safeguarding. Petty Pool Trust is fully committed to complying with all UK legislation and guidance to safeguard children and young people. This policy has been drawn up based on legislation and guidance that seeks to protect young people at risk.

Anyone offering confidentiality to a child would be promising to keep the content of his or her conversation completely secret and discuss it with no one. Promises of confidentiality must not be made whilst in contact with learners. Confidentiality will not be promised by staff if a learner's welfare is considered a safeguarding or child protection concern. Petty Pool will share

information appropriately, restricting it to circumstances where it is needed to ensure children and adults at risk well-being and safety.

Petty Pool will keep all safeguarding records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of our learners. We will cooperate with Police and Children's Services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children 2022.

Sometimes, we are asked to share information about individuals with other organisations when there is not a concern about abuse or harm. If this happens, we will only share information when we have that person's explicit consent to do so.

## Early Help

All staff should be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge or alternatively where a young person is already known to the local authority children's social care.

If a young person has not suffered and is not likely to suffer significant harm but is in need of additional support in the form of early help services, the DSL will always seek consent to share any welfare information. This includes:

- Disability
- specific additional needs
- certain health conditions including mental ill-health
- at risk of 'honour-based abuse
- County Lines including sexual or criminal exploitation
- a parent in prison/parental offending
- persistent absence from education.

The best interests of the learner must always take priority and their wishes and feelings taken into account whilst decisions are made about suitable support. The DSL monitors the Early Help process in relation to children by using the local Threshold Document.

## Multi-agency working

We recognise and are committed to our responsibility to work within local multi-agency safeguarding arrangements. The DSL and Pastoral and Welfare Manager will work to establish strong and co-operative local relationships with the right professionals in other agencies in line with statutory guidance. We recognise the importance of multi-agency working and are committed to working alongside partner agencies to provide a coordinated response to promote learners' welfare and protect them from harm. This includes contributing to local safeguarding processes as required. For example, relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other Early Help multi-agency meetings.

## Confidentiality and the Sharing of Information

This section should be read in conjunction with the Data Protection Policy.

It is imperative that information gained whilst working as an employee is only ever to be disclosed on a 'need to know' basis. The DSLs will determine the extent of the information to be shared and identify staff who may 'need to know' sensitive welfare and safeguarding information. Information should not be shared without prior consultation with the DSL. The unnecessary discussion of any information about children, young people and/or adults at risk is inappropriate. This is true even if the identities at issue are not disclosed. Anyone employed or associated with Petty Pool Trust should therefore be cautious in what they say in public about individuals and activities.

## Whistleblowing

We want to protect children, young people and adults at risk. Staff members on the frontline may be the only ones aware of potentially unsafe or inappropriate practice and it is important that they can raise awareness of it without fear of reprisal, regardless of whether the suspicions or allegations turn out to be true. One of the ways we do this is to provide an accessible reporting system to reveal any poor practice, abuse or unethical behaviour by staff within the

organisation to those in positions of authority.

Concerns about staff behaviour, activity or practice that could impact or potentially impact on the safety and welfare of our learners or those involved in the delivery of education programmes should be reported immediately to the Principal or CEO and recorded as a 'high-level safeguarding concern' on Databridge. Concerns can be raised without fear of reprisal regardless of whether the suspicions or allegations turn out to be true.

Preventing and Responding to:

## Bullying and E-safety

Our E-safety Policy provides guidance on how we use the internet and social media and our procedures for doing this. It also outlines how we expect our staff and learners to behave online. The purpose of the policy is:

- To protect all young people and adults at risk who make use of technology whilst in our care
- To provide staff, young people and adults at risk with a policy regarding on-line safety and how to respond to it
- To ensure our organisation is operating in line with our values and within the law regarding how we behave on-line.

## Anti -Bullying

This section should be read in conjunction with the Behaviour Policy and e-safety Policy.

Our Safeguarding and Prevent Policy sets out how we feel about bullying at Petty Pool, what we will do to tackle it and how we will support young people, adults at risk and our staff and volunteers who experience or display bullying behaviour.

Bullying:

- All forms of bullying will be acted upon
- Everybody at Petty Pool has a responsibility to work together to stop bullying
- Bullying can include online as well as offline behaviour

Bullying behaviour can include:

- physically pushing, kicking, hitting, pinching, etc.
- name calling, spreading rumours, persistent teasing and



- humiliation or the continual ignoring of others
- posting of derogatory or abusive comments, videos or images on social media
- racial, homophobic, transphobic or sexist comments, taunts or gestures
- sexual comments, suggestions or behaviour
- unwanted physical contact.

We will;

- recognise our duty of care and responsibility to safeguard all learners from harm
- promote and implement this anti-bullying policy in addition to the Safeguarding and Prevent policy and procedures
- ensure that bullying behaviour is not tolerated or condoned
- require all staff members and volunteers to sign up this policy
- take action to investigate and respond to any reports of bullying from young people
- encourage and facilitate learners and staff to play an active part in developing and adopting an agreed set of behaviour principals
- ensure that staff are given access to information, guidance and training on bullying.

Each staff member and learner will:

- encourage individuals to speak out about bullying behaviour
- respect every child, young person and adult's need for, and right to an environment where safety, security, praise, recognition and opportunity for taking responsibility are available
- respect the feelings and views of others
- recognise that everyone is important and equal, and that our differences make each of us special and worthy of being valued
- show appreciation of others by acknowledging individual qualities, contributions and progress
- ensure safety by having rules and practices carefully explained and displayed for all to see
- report incidents of bullying behaviour they see – by doing nothing you are condoning the behaviour.

Supporting young people and adults at risk:

- We will let young people and adults at risk know who will listen

to and support them

- We will create an “open door” ethos where they feel confident to talk about bullying behaviour or any other issue that affects them
- Potential barriers to talking (including those associated with disability or impairment) will be acknowledged and addressed at the outset to enable children and young people to speak out
- We will make sure young people, adults at risk and staff are aware of helpline numbers
- Anyone who reports an incident of bullying will be listened to carefully and reports will be taken seriously
- Any reported experience of bullying behaviour will be investigated and will involve listening carefully to all those involved
- Young people, adults at risk and staff experiencing bullying behaviour will be supported and helped to uphold their right to work and live in a safe environment
- Those who display bullying behaviour will be supported and encouraged to develop better relationships

Support to the parents/guardians:

- Parents or guardians will be advised on the anti-bullying policy and practice
- Any experience of bullying behaviour will be discussed with the young person’s parents or carers
- Parents will be consulted on next steps, and we will agree on these actions together
- Information and advice on coping with bullying will be made available
- Support will be offered to parents, including information from other agencies or support lines.

## Child on Child Abuse

As an organisation working with vulnerable young people, we recognise the importance of keeping them safe. Child on child (peer on peer) abuse, including abuse within intimate relationships can impact on learners in a number of different ways including physical injury, compromised sexual health and criminality. We will keep learners safe by training our staff to recognise, refer and record any

concern in this area immediately to the DSL.

## Procedure For Learners on Offsite Work Based Placements

Learners' work-placement companies/employers will be furnished at the outset with a 'Safeguarding Agreement' which outlines our responsibility to report any incidents of inappropriate practice or safeguarding issues.

- Learners should report safeguarding concerns to their job coach or any other member of the Petty Pool team.
- Staff members will notify the DSL and record on Databridge
- Staff should be clear on reporting a safeguarding or welfare issue as illustrated.
- The Curriculum Manger, Vice Principal or DSL must notify the employer or an authorised person from the work-placement company, and together they will decide on next steps, taking advice where necessary, if the information is such that the matter should be referred immediately to Social Services.
- A job coach or DSL will provide the learner with advice and/or support and, if necessary, signpost them to external support services where appropriate.

## Site Safety and Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Staff are required to always wear ID badges on the Petty Pool site.

Visitors will be expected to, sign in and out via Main Reception and to display a visitor's badge whilst on site. Trustees must always display their Trustee badge when on site.

Staff will be expected to adhere to any safety arrangements remaining in place due to Covid-19 restrictions. Appropriate checks will be undertaken in respect of visitors coming onto our premises as outlined within guidance.

Visitors will be expected to adhere to any safety arrangements remaining in place due to Covid-19 restrictions.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

We will not accept the behaviour of any individual that threatens security or leads others to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access to site in the future.

## Prevent Duty

### Safeguarding students who are vulnerable to extremism

Petty Pool Trust has a responsibility to fulfil the Prevent duty statement by protecting learners and employees from radicalising influences and ensuring they are resilient to extreme narratives. As a responsible organisation we will look to identify any changes in behaviour and deal with any issues raised by them. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable young people to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation. The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism. It is rare for young people to become involved in terrorist activity. However, some learners from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, Petty Pool Trust takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

### Signs and Indicators

Radicalisation can be difficult to spot. Signs that may indicate a young person is being radicalised include:

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- Using inappropriate language
- Unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Sympathetic to extremist ideologies and groups

- Changing identify or friends online
- Endorsing material of an extremist nature.

Young people who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. However, these signs do not necessarily mean a person is being radicalised – it may also be the typical behaviour or a sign that something else is wrong.

Petty Pool Trust takes measures to protect and make learners and employees resilient to extreme narratives in the following way:

- A staff induction which includes the certificated module on the Prevent Duty
- Relevant content is delivered to all learners as part of their curriculum inclusive of Equality and Diversity, Prevent, Safeguarding, Fundamental British Values.
- All managers are briefed on their duty and responsibility regarding Prevent
- Annual Prevent staff training is scheduled and delivered through e-learning modules

## The Chanel Process



## Complaints

Petty Pool Trust recognises the right of young people, their parents/carers and adults at risk to have access to the complaints' procedure. We intend to ensure that all comments are taken seriously and dealt with swiftly and in confidentiality.

Young people, adults at risk and, where appropriate, parents/carers should know how to, and feel able to, complain or make comments if they are unhappy or pleased with any aspect of our organisation. We manage this process through our Complaints Policy and procedure.

## Contact Details

Safeguarding children and young people or keeping them safe is everybody's responsibility. If you think that someone may be the victim of abuse, neglect, radicalisation or they may be at risk of harm, you should always report your concerns to:

Designated Safeguarding Lead –  
[graham.hunter@pettypool.org.uk](mailto:graham.hunter@pettypool.org.uk)

Deputy Designated Safeguarding Lead –  
[gemma.limberg@pettypool.org.uk](mailto:gemma.limberg@pettypool.org.uk)

Or via telephone: 01606 889097

Children's Services and Adult Safeguarding Duty Teams will generally work 9am to 5pm Monday to Friday, and have an answerphone for out of office hours and weekends.

As Petty Pool Trust works with many different local authorities, the Safeguarding Team will contact the relevant Safeguarding Team dependant on each individual situation.

## In an emergency always dial 999

- Police emergency – 999
- Police non-emergency – 101
- NSPCC Helpline - 0808 800 5000
- CEOP - [www.ceop.police.uk](http://www.ceop.police.uk)

## Annex 1

### National Support Organisations

Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)

Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### Support for Learners

ChildLine: [www.childline.org.uk](http://www.childline.org.uk)

Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)

The Mix: [www.themix.org.uk](http://www.themix.org.uk)

Shout: [www.giveusashout.org](http://www.giveusashout.org)

Fearless: [www.fearless.org](http://www.fearless.org)

### Support for adults

Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)

Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)

Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

The Samaritans: [www.samaritans.org](http://www.samaritans.org)

NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)

MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)

Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)

Shout: [www.giveusashout.org](http://www.giveusashout.org)

### Support for Learning Disabilities

Respond: [www.respond.org.uk](http://www.respond.org.uk)

Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### Domestic Abuse

Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)

Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)

Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)

Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)

Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)

National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)

Respect Phonenumber: <https://respectphonenumber.org.uk>

Honour Based Abuse

Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)

FGM Factsheet:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/4964](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/4964)

Mandatory reporting of female genital mutilation: procedural information:

[Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Contextual Safeguarding, Peer on Peer abuse, Sexual Exploitation and Criminal Exploitation

Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>

National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)

Rape Crisis: <https://rapecrisis.org.uk>

Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)

Brook: [www.brook.org.uk](http://www.brook.org.uk)

Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)

Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)



Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)

Substance Misuse

We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)

Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)

Mental Health

Mind: [www.mind.org.uk](http://www.mind.org.uk)

Moodspark: <https://moodspark.org.uk>

Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)

We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)

Online Safety

CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)

Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)

Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

Childnet: [www.childnet.com](http://www.childnet.com)

UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)

Report Harmful Content: <https://reportharmfulcontent.com>

Parents Info: [www.parentinfo.org](http://www.parentinfo.org)

Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)

Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)

NSPCC/ Net Aware: [www.nspcc.org.uk/online-safety](http://www.nspcc.org.uk/online-safety) and [www.net-aware.org.uk](http://www.net-aware.org.uk)

Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)

Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)

Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)

Radicalisation and hate

Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)

Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)

True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## Annex 2

### Categories and Signs of Abuse

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. Abuse in an adult is a violation of an individual's human and civil rights by another person or persons.

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

#### Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance

- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing or changing
- Sexually transmitted disease
- Fire setting

Physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that MAY INDICATE physical abuse:

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible
- explanations or a delay in seeking treatment should signal concern.

Emotional abuse: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the

child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse:

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers).

There are 4 different areas of neglect:

- Physical neglect  
A child's basic needs, such as food, clothing or shelter, are not met or they aren't properly supervised or kept safe
- Educational neglect

- A parent doesn't ensure their child is given an education
- Emotional neglect  
A child doesn't get the nurture and stimulation they need. This could be through ignoring, humiliating, intimidating or isolating them
- Medical neglect  
A child isn't given proper health care. This includes dental care and refusing or ignoring medical recommendations.
- Self-neglect  
In relation to adults covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Signs that MAY INDICATE neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Annex 3

### Glossary of Terms

Terminology in this area is complex and changes as services are reshaped. This glossary sets out some key terms. The definitions below are extracted from Working Together 2018 / Care Act 2014:

- **Adult** is anyone aged 18 or over.
- **Adult at Risk** is a person aged 18 or over who is in need of care and support regardless of whether they are receiving them, and because of those needs are unable to protect themselves against abuse or neglect. In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm

or abuse.

- **Capacity** refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).
- **Young Person/Child**: Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.
- **Child protection**: Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
- **Child sexual exploitation (CSE)**: Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
- **Child trafficking** – a type of abuse where children are recruited, moved or transported, and then exploited, forced to work or sold.
- **Contextual safeguarding**: An approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
- **Cyber Bullying** - cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging,

humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

- **Discrimination** – is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.
- **Early Help** – is the provision of support at an early stage so that relatively minor, yet important issues can be addressed and improved instead of progressing to become a more entrenched problem, such as advice about care of teeth or concerns about parental conflict.
- **Female Genital Mutilation (FGM)**: is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It is also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse.
- **Financial or Material Abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Forced Marriage**: a forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.
- **'Honour-based' violence** (including Female Genital Mutilation and Forced Marriage) is abuse committed in the context of preserving "honour". It often involves a wider network of family or community pressure and can include

multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take” (DfE, 2019a).

- **Mate Crime** - a ‘mate crime’ as defined by the Safety Net Project is ‘when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.’ Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.
- **Modern Slavery**: encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Organisational Abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one’s own home.
- **Peer on Peer Abuse**: There are four key definitions of peer-on-peer abuse:
  - i. Domestic abuse – children or adults at risk who experience physical, emotional, sexual and/or financial abuse, and coercive control, in their intimate relationships, as well as family relationships.
  - ii. Serious youth violence – any offence of most serious violence or weapon-enabled crime, where the victim is aged 19 or younger, e.g. wounding with intent, rape, murder and grievous bodily harm.
  - iii. Harmful sexual behaviour – young people displaying sexual behaviours that are outside of developmentally ‘normative’ parameters.
  - iv. Abuse in intimate personal relationships between peers
- **Radicalisation**: the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the



legitimacy of their cause. This may be direct through a relationship, or through social media.

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

## Children who are absent from education:

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with young people who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including

sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a learner is withdrawn from college, and adhering to requirements with respect to sharing information with the local authority.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a young person is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the young person is suffering or likely to suffer from harm, or in immediate danger.