



# Safeguarding & Prevent Policy

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REF NO. QTL-EXE-004

Approved by Senior Leadership Team (SLT)

<b>Strategy/Policy Responsibility: Senior Leadership Team (SLT)</b>	
<b>Date approved</b>	October 2013
<b>Review date</b>	July 2022
<b>Next review date</b>	October 2023

# Sutton College Safeguarding & Prevent Policy

## 1. Purpose

1.1 The purpose of this Policy is to ensure that Sutton College works together with the relevant agencies to protect adults and young people at risk from, exploitation and radicalization. The policy aims to ensure the safety of staff and learners whilst at the College premises and any concerns related to learner safety are reported to the relevant agencies.

This policy sets out the steps that the College has taken to safeguard learners who are at risk of harm or neglect and the responsibilities of all employees in the spotting, reporting and investigating of suspected abuse or neglect whilst on the College premises or attending an online class or meeting.

## 2. Scope

2.1 This Policy and its accompanying procedures apply to adults and young people who are deemed to be at risk and are learners at Sutton College. However, the College will take its duty of care seriously concerning all staff and learners and concerns will be recorded and reported appropriately.

2.2 Though the majority of abuse and exploitation is often viewed as taking place outside of the College environment, it is still the responsibility of the College to inform the relevant agencies of these concerns.

The College will ensure robust procedures are in place to identify, deal with or report any form of abuse and provide a safe environment for all. This includes preventative measures such as awareness raising events and mandatory training programmes on Safeguarding and Prevent matters.

2.3 The College will act on all reports of alleged abuse or harm whether they are recent or reported to have taken place in the past.

2.4 All employees have a duty to report concerns and failure to do so is a serious abdication of responsibility and will result in disciplinary action.

## 3. Definitions

### 3.1 Who is an Adult and who is a Young Person at Risk?

An adult at risk is a person aged 18 years or over who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. (No Secrets, Department of Health 2000.) An adult at risk may also become so due to a change in circumstances e.g. domestic violence or racial abuse.

A young person at risk is a person aged under 18 who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

#### 4. Abuse

Abuse is defined as 'a violation of an individual's human and civil right by any other person or persons' (No Secrets, Department of Health 2000).

It recognises seven types of abuse:

1. **Physical abuse** - this includes, but is not limited to, hitting, slapping, pushing, kicking, rough handling or unnecessary physical force either deliberate or unintentional; misuse of medication restraint or inappropriate sanctions.

2. **Sexual Abuse and Exploitation** - sexual abuse involves a child, young person or vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the child, young person or vulnerable adult to be aware that the activity is sexual and the apparent consent of the child, young person or vulnerable adult is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. Sexual abuse can happen between people of the same sex, and it can also occur within a marriage or long-term relationship.

3. **Emotional/Psychological abuse** - This includes, but is not limited to, verbal, psychological, intimidation, threats of harm, abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, isolation or withdrawal from services or supporting networks. This also includes forced marriage and modern slavery.

4. **Financial or material abuse** - This includes, but is not limited to theft, fraud, exploitation, pressure in connection with wills, property, or inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.

Grooming is not something that just affects children. Adults can also be groomed and abused. Grooming is the process where the abuser carefully picks their target and they gradually build a relationship with them. The abuser may buy their victim gifts, alcohol or drugs and they will encourage them to be secretive about the friendship / relationship. This can sometimes be referred to as 'mate crime'. In this type of situation, the abuse usually comes later down the line, will usually start small, and will gradually increase. For example, it could start with borrowing small amounts of money and not paying it back. There are different reasons why someone may groom an adult at risk such as financial or material gain, exploitation, sexual harassment/ abuse or radicalisation. There are lots of signs of grooming such as:

- the person suddenly having a new friend / girlfriend or boyfriend;
- they may have new clothes / gifts that they may not previously have been able to afford;
- they may not have money for things like food or may have large sums of money missing from their bank account;
- they may be upset, scared, withdrawn, reluctant to talk about their relationship with the abuser.

Any suspicion of grooming should be reported as a safeguarding concern immediately. Any accusation made regarding any kind of abuse made against a member of College staff by a learner will be investigated immediately, in line with the London Borough of Sutton HR policy.

5. **Neglect** - This includes but is not limited to acts of omission, ignoring medical or physical needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

6. **Discriminatory abuse** - This includes, but is not limited to racist, sexist, abuse based on a person's disability or any of the other protected characteristics, and other forms of harassment, slurs or similar treatment.

7. **Organisational/Institutional abuse** - This relates to the collective failure of an organisation/institution to provide appropriate services for an adult at risk and includes processes, attitudes, behaviour and the failure to ensure safeguards are in place.

- Organisational/Institutional abuse occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care and poor practice which affects the whole setting and denies, restricts or curtails the dignity, privacy, choice, independence or fulfilment of adults and young people at risk. Institutional abuse can occur in any setting providing health and social care.

## 5. Self-Harm

This is not a direct form of harm for safeguarding purposes but staff should be aware of it in the general context of risk assessment /management and consider that they have a duty of care to an individual who places him/herself at risk in this way. Evidence suggests there are normally underlining factors for individuals to implement this behaviour.

## 6. Healthy Relationships

Staff should be aware that - Healthy relationships are about respecting each other, feeling comfortable and treating each other equally. What starts as an unhealthy relationship can become an abusive relationship. Students should be encouraged to develop relationships where they always feel safe and respected, they are able to be themselves, not pretend to be someone else, and do not feel controlled or pressured by anyone, threatened or frightened.

## 7. Specific safeguarding issues

All staff should have awareness of the following safeguarding issues and of the legislative duty in relation to these concerns. Honour-based violence - honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing and modern slavery.

All forms of so called HBV are abuse and should be handled and escalated as such.

- FGM mandatory reporting duty - from October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales. Professionals must make a report to the police, if, in the course of their duties:
  - They are informed by a girl under the age of 18 that she has undergone an act of FGM.
  - They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.
- Forced Marriage - forced marriage is a term used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will.
- **Incels**– Involuntary celibates or the Incel communities are radical, mainly online forums populated by disaffected young men and centred on violent misogyny and feature themes such as violent and non-violent misogyny, ill mental health, suicidal ideation, and

others. Some Incels believe that women's political empowerment and ability to select their sexual partners have severely degraded men's social status thus preventing them from having romantic relationships with the opposite sex. Racial hatred and far-right extremism are also common in some online Incel forums.

**Any causes for concern as listed above should be reported to the College safeguarding officer immediately .**

## 8. Prevent Duty and Radicalisation

- **Radicalisation and extremism** occurs when an individual or group comes to adopt increasingly extreme political, social, religious ideals, mixed unclear ideologies and aspirations that reject or undermine British Values

In line with the 'Prevent' Strategy (2011), Sutton College sees one of the central issues for practitioners as how to take account of the risks presented by extremism and radicalisation as part of safeguarding children, young people and adults.

### Radicalisation

Radicalisation can occur by extremists trying to convert others to their way of thinking and, in some cases, commit acts of violence. Sutton College has a duty to protect its staff and learners from being radicalised. Any vocal, active opposition, website or literature detrimental to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs can be defined as extremism.

Those who

**British Values are defined as follows:**

#### Democracy

Your opinion counts

#### The rule of law

- No one is above the law
- Laws protect everyone
- Innocent until proved guilty

#### Individual liberty and mutual respect

- Freedom of speech

#### Tolerance of different faiths and beliefs

All backgrounds and cultures, ages, genders, sexualities and religions and beliefs

The Prevent Strategy is not just about discussing extremism itself, it is also about promoting values in learners such as tolerance and mutual respect.

**Any or all of the above listed types of harm/abuse may be perpetrated as the result of deliberate intent, negligence, or ignorance.**

## **9. Systems and Processes**

9.1 Alerting - Any employee may be alerted to the possibility of abuse. Alerting could mean that an act of abuse is witnessed, a person saying that harm or abuse has occurred, or suspicions raised by indicators listed

9.2 It is the responsibility of all staff, regardless of organisational role, to immediately report and refer any incident of harm/abuse or suspected abuse to their line manager or Safeguarding Officer

9.3 The Head of Service is the Designated Lead Officer for Safeguarding and Prevent. Other College Safeguarding Officers are the Director of Learner Services and the Director of Curriculum.

In the event of a member of staff being unsure as to whether it is a safeguarding issue the matter should still be reported and a Safeguarding Officer will advise. A Safeguarding Referral form should also be completed via the Sutton College Intranet

**Disclosures and concerns should not be treated as confidential. *Explain to the person reporting the alleged abuse that you cannot keep information confidential as you have a "duty of care", and that you must inform your designated safeguarding officer***

If a learner lacks the capacity to consent (as prescribed in current legislation) the College will report the alleged harm/abuse immediately in order to act in the best interests of the individual.

Information about abuse must never be withheld intentionally (deliberately withholding information will lead to disciplinary action) as failure to disclose may have an influence on the future safety of an individual. (No Secrets, Department of Health 2000.)

8.4 On-line safety and E-safety The College will endeavour to both filter and monitor all internet usage within the College in a responsible and transparent way in order to ensure and maintain the safety of staff and learners.

Staff delivering courses online still have a duty of care to report any safeguarding concerns. They must also the following necessary steps to safeguard themselves whilst delivering an online class.

- **Use background image or blur to protect your privacy and encourage learners to do the same**
- **Normal work dress codes apply to remote learning**
- **Do not have personal information or photographs on display**

Particular care should be taken when presenting your screen to learners. Familiarise yourself with the Meet controls to ensure you are sharing just the needed browser tab or window required. Be sure to avoid exposing family photos, personal data or inappropriate materials to learners. This could include desktop backgrounds, entries in autocomplete fields and saved internet favourites, all of which could be shown to learners by 'over-sharing'.

Respect data protection regarding learner details such as personal emails.

The Learner Code of Conduct applies to all learners whether attending College premises or learning online. Therefore, the learner should be dressed appropriately for an online class and behave as if they were attending College. For safeguarding purposes, encourage the learner to blur their background if possible and not to display personal information or photographs to other members of the class. It is also a safeguarding requirement that the learner has their camera on for the duration of the lesson.

Whilst it may not always be as easy to identify a safeguarding concern whilst teaching online, any concerns should be reported immediately. If you have a concern, you may wish to talk to the learner privately in a break out room if possible or send them a separate meeting request. A safeguarding officer can attend these meetings if required.

Learners should be informed at their induction of the College's safeguarding procedures. A learner can report a safeguarding concern direct to their tutor, ask to speak to a safeguarding officer or report their concern confidentially via the College website under the student tab.

This report will be automatically flagged immediately with the College safeguarding officers. The learner can also email [safeguarding@suttoncollege.ac.uk](mailto:safeguarding@suttoncollege.ac.uk)

Staff can report a safeguarding concern via the Safeguarding Helpdesk on the Sutton College Intranet, the safeguarding reporting facility on the College website or speaking with any of the safeguarding officers.

#### 10. Sexting

If staff are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), they must report it to the Safeguarding Team immediately. Staff must not: view, download or share the imagery yourself, or ask a learner to share or download it. If staff have already viewed the imagery by accident, this must be reported to the Safeguarding Officer. Staff should not delete the imagery or ask the learner to delete it.

#### 11. Photography

To prevent any person being photographed in circumstances which may compromise their dignity or confidentiality the use of all photographic equipment must be sanctioned by a member of the Senior Leadership Team and in consultation with the individual concerned and/or their family if appropriate. Learners are requested to complete a photograph permission slip.

#### 12. Site security

All staff are required to electronically sign in and out of buildings as required. All tutors are to ensure all learners are identified on the class register and not to allow entry to anyone not listed unless prior notification has been given. Anyone trying to access the classroom should be redirected back to Centre Support Staff for clarification. If/when staff are working at external sites all staff are required to wear their badges and abide by the signing in rules and procedures of the external organisation.

The College operates a visible ID policy and learners/staff/visitors and contractors should wear ID badges at all times whilst on College premises.

## Referencing / Signposting

External Policies and documents that have informed the policy:

“No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults and young people from abuse” Department of Health (2000).

- [No Secrets \(Department of Health 2000\)](#)

Safeguarding Vulnerable Groups Act 2006.

- [Safeguarding Vulnerable Groups Act 2006](#)

Education Inspection Framework

Children’s Act and Education Act / Keeping Children Safe

Prevent Strategy 2011

Protecting Adults & Young People at Risk: London multi-agency policy and procedures to safeguard adults and young people from abuse - Adults & Young People’s Services SCIE Report 30 January 2011.

Internal Policies and documents that have informed the policy:-

Visible ID Policy

Young Learners Policy

IT Policy

Personal Data Protection Policy

Sutton College Modern Slavery Statement