



Safeguarding & Prevent Policy

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Sutton College Safeguarding & Prevent Policy

1. Purpose

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 abuse, exploitation and radicalisation. 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.

Keeping Children Safe in Education 2024

The College Policy complies and adheres to Keeping Children Safe in Education 2024 which sets out the legal duties the College must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

Safeguarding Vulnerable Groups Act 2006

The College policy complies and adheres to the Safeguarding Vulnerable Groups Act (SVGA) 2006 which was passed to help avoid harm, or risk of harm, by preventing people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.

2. Scope / Objectives

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, harm, exploitation or radicalisation 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, harm, exploitation or radicalisation 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, discriminatory abuse or homelessness.

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.

The College policy applies to all children under 18 or any vulnerable adult aged 18 or above.

The College recognises the definitions of abuse, sexual harassment and other related terms as detailed.

Learners' Safety and Well-Being

Everyone who has responsibility for learners must take steps to promote their well-being and safety. The potential risks to learners are very broad and some are listed in this policy.

Tutors should be aware of these risks and be alert to the possibility that some of their learners may be experiencing some of these problems. The College recognises that learners with vulnerabilities and the circumstances of specific categories of learners render them particularly vulnerable to certain types of abuse.

These categories include:

- Learners with Special Educational Needs and Disabilities (SEND)
- Looked After Children (LACs) / Young Care Leavers (YCLs)
- Learners on English for Speakers of Other Languages (ESOL) courses
- Adults at risk Children and adults with SEND maybe subject to additional safeguarding challenges as they may have difficulties with communication and are at higher risk of peer group isolation and may be disproportionately affected by bullying.

College staff are made aware that behaviour, mood and injury may relate to possible abuse and not just the physical or learning needs of SEND learners through safeguarding training and other opportunities.

4. Responsibilities

The Governing Board will approve and regularly review the Safeguarding & Prevent Policy for Children and Vulnerable Adults and will ensure that all governors receive appropriate safeguarding and prevent training at induction along with attendance at CPD sessions and online training. This training will equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place at the College are effective and support the delivery of a robust whole College approach to safeguarding. Training will be updated and delivered annually.

The Governing Board will ensure that Sutton College fulfils its legal duties and responsibilities. These include, for example, those under the Equality Act 2010, and those in relation to the 'Prevent' strategy and safeguarding.

They will ensure that the College has an effective culture of safeguarding that enables staff to: identify, help and protect learners who may need early help or who are at risk of neglect, abuse, grooming, exploitation, radicalisation or extremism; help learners to reduce their risk of harm by securing the support they need, or referring in a timely way to those who have the expertise to help; and manage safe recruitment and allegations about adults and learners who may be a risk to other learners and vulnerable adults.

Designated Governor with responsibility for Safeguarding

The Designated Governor will be responsible for liaising with the Principal and Designated Safeguarding Lead (DSL) to ensure that:

- The College's Policy meets Local Safeguarding Children's Board requirements (London Borough of Sutton)
- The policy is subject to annual review by the Governing Board
- The Governing Board is informed of how the College and its staff have complied with the policy (including training undertaken)
- The Designated Governor will also be responsible for overseeing liaison with appropriate agencies in connection with allegations against the Principal. This will not involve undertaking a formal investigation, but will ensure communication between parties and provide information to assist enquiries. To assist the Designated Governor to fulfil these duties, he/she shall receive appropriate training.

Designated Safeguarding Lead (DSL)

The DSL is responsible for safeguarding and Prevent within Sutton College will:

- Take the lead responsibility for safeguarding and child protection (including online safety). This will be explicit in the role holder's job description.
- Have the appropriate status, authority and availability within the College to carry out the duties of the post (they will be given the additional time, funding, training, resources and support they need to carry out the role effectively).

Ensure they:

- Manage referrals
- Work with others
- Share information
- Raise awareness
- Have the training, knowledge and skills
- Provide support to staff
- Hold and share information
- The College also has one Deputy Designated Safeguarding Officer who is trained to the same standard as the DSL and the role is explicit in their job description
- Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated

Senior Person with responsibility for Staff will:

- Ensure that the recruitment of staff (permanent and temporary) and use of volunteers meets safer recruitment guidelines, including the use of the Disclosure and Barring Service (DBS).
- Work in collaboration with the DSL to ensure that all staff and volunteers receive training and regular updates on recognising, responding and reporting concerns.
- Ensure that new staff and volunteers receive training as part of a wider induction on safeguarding procedures within the College and have access to this policy document.
- Ensure the mechanisms exist to ensure that the use of temporary and agency staffing comply with the College's safeguarding responsibilities and procedures.
- Ensure that applicants with a disclosed criminal conviction are appropriately and robustly assessed by investigating disclosures and assessing associated risks to both self and others based on their application to teach.

The IT Manager will:

- Ensure a safe online environment by filtering and monitoring activity using appropriate software and investigating any online incident reporting logs.
- Provide advice, supporting and training to staff and learners.
- Ensure that all safeguarding concerns are recorded accurately and securely in line with data protection regulations.
- Liaise with the College Safeguarding Lead as appropriate.

Members of the Safeguarding Team have responsibility for:

- Providing frontline contact for the reporting of safeguarding concerns.

- Referring cases of suspected abuse, allegations of abuse or incidents of harm to the relevant agencies.
- Maintaining accurate records of any safeguarding referral, complaint or concern (even when that concern does not lead to a referral) in line with data protection regulations.
- Dealing with individual cases, including attending case conferences and review meetings as appropriate.
- Keeping the Safeguarding Lead with responsibility for Safeguarding within the College informed about all cases of suspected abuse, allegations of incidents, abuse, harm, exploitation or radicalisation.

All Staff

Safeguarding is the responsibility of all Sutton College staff. Staff should contact the Safeguarding Team via the College internal channels if they have a concern relating to a learner at risk of or experiencing abuse, harm, exploitation or radicalisation

All staff have a duty to ensure they participate in and complete regular safeguarding training and updates and must be aware of their roles and responsibilities in preventing violent and non-violent extremism.

Sutton College recognises that positive professional relationships with learners will support the best outcomes and that appropriate professional boundaries safeguard learners and safeguard staff from unfounded allegations. It is the prime duty of the College to provide a safe and secure learning environment and protect the welfare of its learners and staff. It is essential that staff consider their conduct relating to communication with learners both face to-face and electronically.

Staff with responsibilities for trips and work placements/work experience

Staff who organise learner trips or learner work placements/work experience must ensure that a full risk assessment is completed, along with an External Visits form. In addition, the trip or work placement/work experience organiser should confirm who the identified person is who can be contacted out of normal college hours. This person would be a member of the SLT on call rota.

5. Assurances

Several measures are in place to ensure that staff, learners, visitors, and other stakeholders are informed of our safeguarding and Prevent responsibilities and expectations. These include:

- A dedicated Safeguarding Team, easily identifiable through introductions and College posters.
- A readily accessible safeguarding referral form available on both the staff intranet and College website, which alerts all College Safeguarding Officers to ensure no concerns are overlooked.
- A sign-in process at reception for all visitors and contractors, who are issued a visitor badge or lanyard.
- Safeguarding posters displayed throughout the centre.
- Safeguarding information included in student handbooks.

- "Three Steps to Keeping Safe" leaflets displayed across the College and on the College website.
- Mandatory Safeguarding and Prevent training for all staff and Governors.

A number of assurances exist to ensure that staff, learners, visitors and other stakeholders are aware of our duties and expectations in relation to safeguarding and prevent.

Assurances include:

- Safeguarding Team with responsibility for safeguarding are easily identifiable by introduction and College posters and pull up banners.
- Accessible Safeguarding referral form available on staff intranet and College website. This immediately flags with all College Safeguarding Officers so that no concerns are missed by staff.
- All visitors and contractors sign in at reception and are issued with a visitor badge/lanyard.
- Safeguarding posters throughout the centre.
- Safeguarding Information in Student handbooks.
- Three steps to Keeping safe leaflet displayed around the College and on the College website.
- Mandatory Safeguarding and Prevent training for all staff and Governors.

6. The Role of the Local Authority Designated Officer (LADO)

The LADO is responsible for managing all child protection allegations made against staff and volunteers who work with children and young people in Sutton.

How the LADO manages allegations

The LADO protocol sets out the actions to take when it is suspected that a professional has harmed a child or young person.

Making a referral to LADO

Referrals to the LADO should be made by a designated senior manager, within one working day of being made aware of the allegation. London Borough of Sutton - Role of LADO

The College will report any concerns to the London Borough of Sutton Safeguarding team and will be guided by any advice will implement any actions as instructed by the London Borough of Sutton Safeguarding Team or the LADO.

7. Monitoring and Review

Safeguarding is not graded specifically in the Ofsted Education Inspection Framework, but it remains a limiting factor for inspection and will be referenced in the Leadership and Management section of an inspection report. A judgement will be made on whether arrangements for safeguarding learners are effective. For all inspections, inspectors will be looking for evidence that 'the provider has a culture of safeguarding

that supports effective arrangements to identify learners who may be at risk; which responds in a timely way; and that staff recruitment is managed and any allegations are dealt with appropriately. The Governing Board must ensure that there is liaison with the College Principal and Designated Safeguarding Lead and other Safeguarding Officers over matters regarding Safeguarding Children and Vulnerable Adults.

Safeguarding and Prevent is on every Governing Board meeting agenda and the board receives a Safeguarding and Prevent update at every meeting.

8. 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).

Sutton College acknowledges that there are several different types of abuse:

8.1. Physical abuse

A form of abuse which may involve but is not limited to hitting, slapping, pushing, kicking, rough handling, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or unnecessary physical force either deliberate or unintentional; misuse of medication restraint or inappropriate sanctions. Causing physical harm to a child or vulnerable person.

Possible signs and symptoms:

- unexplained recurrent bruises, injuries or burns
- improbable excuses or refusal to explain injuries
- wearing clothes to cover injuries, even in hot weather
- refusal to undress for activities
- bald patches
- chronic running away
- fear of medical help or examination
- self-destructive tendencies
- aggression towards others
- fear of physical contact - shrinking back if touched
- admitting that they are punished but the punishment is excessive (such as a child being beaten every night to "make him/her study"); and/or
- fear of suspected abuser being contacted

8.2 Domestic abuse/ violence

Types of domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined:

- psychological
- physical
- sexual
- financial
- emotional

Possible signs and symptoms

- Psychological/emotional abuse: Includes name-calling, threats and manipulation, blaming you for the abuse or 'gaslighting' you.
- Coercive control: When an abuser uses a pattern of behaviour over time to exert power and control. It is a criminal offence.
- Physical abuse: This isn't only hitting. He might restrain you or throw objects. He might pinch or shove you and claim it's a 'joke'.
- Tech abuse: S/He might send abusive texts, demand access to your devices, track you with spyware, or share images of you online.
- Economic abuse: Controlling your access to money or resources. S/He might take your wages, stop you working, or put you in debt without your knowledge or consent
- Sexual abuse: This doesn't have to be physical. S/He might manipulate, deceive or coerce you into doing things you don't want to do.

8.3. Sexual Abuse and Exploitation -

Sexual abuse involves forcing or enticing a child or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or adult at risk 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. Abuse may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, images or other media of sexual activities, encouraging children or vulnerable adults to behave in sexually inappropriate ways, or grooming and the apparent consent of the child or adult in preparation for abuse (including via the internet). Sexual abuse can be carried out by anyone including children and vulnerable adults.

Possible signs and symptoms:

- Being excessively affectionate or knowledgeable in a sexual or inappropriate way.
- Medical problems such as chronic itching, pain in the genitals, sexually transmitted diseases.
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia.
- Personality changes such as becoming insecure or clinging.
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys.
- Sudden loss of appetite or compulsive eating.
- Being isolated or withdrawn.
- Inability to concentrate.
- Lack of trust or fear of someone they know well, such as not wanting to be alone with them.

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.

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, eg, 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 she/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

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.

8.4. 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.

8.5 Modern Slavery

Modern slavery is a serious crime.

Victims are:

- exploited
- controlled or held captive
- threatened or punished to stop them escaping or reporting the crime

Anyone can be a target for modern slavery. But some people can be at more risk because of money, social or health issues, or because of their age or immigration status.

Threats and punishments can often be violent, but not always. They can include threatening to tell the authorities about the victim's immigration status in order to get them deported from the country.

Modern slavery includes forced labour, criminal exploitation, drugs, sexual exploitation, organ trafficking and human trafficking. This is when victims are taken between countries or around a country so they can be exploited.

Modern slavery can happen anywhere in any situation. Each case is different, and may not fit the stereotype of groups of people being forced to work in fields or on fishing boats.

The signs of forced labour, and criminal or sexual exploitation can be very different. Victims might look helpless and afraid, but they can also seem to accept their situation, be completely unaware of it, or even defend the people who are exploiting them.

The persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and adverse effects on the person's emotional development. It may involve conveying to a child or vulnerable adult 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 or vulnerable adult 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 or vulnerable adults. These may include interactions that are beyond a child or vulnerable adult's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child or vulnerable adult from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children or vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children or vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, although it may occur alone.

Possible signs and Symptoms of Modern Slavery

- physical, mental and emotional development lags
- sudden speech disorders
- continual self-depreciation ("I'm stupid, ugly, worthless, etc.")
- over-reaction to mistakes
- extreme fear of any new situation
- inappropriate response to pain ("I deserve this");
- neurotic behaviour (rocking, hair twisting, self-mutilation); and/or
- extremes of passivity or aggression

8.6 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales.

A forced marriage is where one or both people do not, or cannot, consent (agree) to the marriage.

Forced marriages can happen to anyone from any background and nationality, and can affect both males and females. It does not only happen to young people, it can happen to adults too.

It's different to an arranged marriage where there's a choice and both people agree to it.

Forced marriage is often linked to honour-based abuse, although this isn't always the case.

Forced marriage and the law

It is illegal in the UK to force someone to marry, this includes:

- taking someone abroad to force them to marry (even if the forced marriage does not take place)
- marrying someone who cannot consent to the marriage

You have the right to choose who you marry, when you marry or whether you want to get married or not.

Being forced to marry

It's possible that your parents or family are forcing you to marry because they think it's the best thing for you. Or some families may see forced marriage as part of their religion or culture.

They might be putting pressure on you in the following ways:

- physical abuse: threats, physical and sexual violence
- emotional and psychological abuse: making you feel like you're bringing shame on your family
- financial abuse: having your wages taken away or withholding money

If you have already been forced into a marriage this abuse might still be happening.

Forced marriage warning signs

Forced marriage could be happening to someone you know. Some signs that someone could soon be (or is already) a victim of forced marriage:

- running away from home
- self-harming or attempted suicide
- depression, or becoming worried or withdrawn
- poor performance at work, school or college or unexplained absence
- a surprise engagement to a stranger you've not heard of before
- a sudden holiday (some people are tricked into going abroad for a holiday or to see relatives)
- no control over their own money
- not returning from a visit to another country

8.7 Financial or material abuse

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

Signs of financial or material abuse

- missing personal possessions
- unexplained lack of money or inability to maintain lifestyle
- unexplained withdrawal of funds from accounts
- power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- the person allocated to manage financial affairs is evasive or uncooperative
- the family or others show unusual interest in the assets of the person
- signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy
- recent changes in deeds or title to property
- rent arrears and eviction notices
- a lack of clear financial accounts held by a care home or service
- failure to provide receipts for shopping or other financial transactions carried out on behalf of the person

- disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- theft of money or possessions
- fraud, scamming.
- preventing a person from accessing their own money, benefits or assets
- employees taking a loan from a person using the service
- unnecessary property repairs or overpriced property repairs and failure to carry out agreed repairs or poor workmanship
- undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- arranging less care than is needed to save money to maximise inheritance
- denying assistance to manage/monitor financial affairs
- denying assistance to access benefits
- misuse of personal allowance in a care home
- misuse of benefits or direct payments in a family home
- someone moving into a person's home and living rent free without agreement or under duress
- false representation, using another person's bank account, cards or documents
- exploitation of a person's money or assets, e.g. unauthorised use of a car
- misuse of a power of attorney, deputy, appointeeship or other legal authority

8.8 Grooming

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, food 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.

Though grooming can take many different forms, it often follows a similar pattern.

- **Victim selection:** Abusers often observe possible victims and select them based on ease of access to them or their perceived vulnerability.
- **Gaining access and isolating the victim:** Abusers will attempt to physically or emotionally separate a victim from those protecting them and often seek out positions in which they have contact with minors.
- **Trust development and keeping secrets:** Abusers attempt to gain the trust of a potential victim through gifts, attention, sharing "secrets" and other means to make them feel that they have a caring relationship and to train them to keep the relationship secret.
- **Desensitization to touch and discussion of sexual topics:** Abusers will often start to touch a victim in ways that appear harmless, such as hugging, wrestling and tickling, and later escalate to increasingly more sexual contact, such as massages or showering together. Abusers may also show the victim pornography or discuss sexual topics with them, to introduce the idea of sexual contact.

- **Attempt by abusers to make their behaviour seem natural**, to avoid raising suspicions.

Online Grooming

Online grooming often involves adults creating fake profiles and posing as children or teens to befriend someone and gain their trust. This may be the first step towards sexual abuse or online stalking or harassment.

Signs of Grooming

- 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.

8.9. 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.

Signs of neglect

- Poor condition of accommodation.
- Inadequate heating and/or lighting.
- Physical condition of person poor, e.g. ulcers, pressure sores etc.
- Person's clothing in poor condition, e.g. unclean, wet, etc. ...
- Sensory deprivation, not allowed to have access to glasses, hearing aids etc.
- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care.
- Providing care in a way that the person dislikes.
- Failure to administer medication as prescribed.
- Refusal of access to visitors.
- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care.
- Providing care in a way that the person dislikes.
- Refusal of access to visitors.
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs.
- Ignoring or isolating the person.
- Preventing the person from making their own decisions.
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity.

8.10 Discriminatory abuse

There are different types of discriminatory abuse, some of which are also criminal offences. Discriminatory abuse is unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)

- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic.
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader.
- Harassment or deliberate exclusion on the grounds of a protected characteristic.
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic.
- Substandard service provision relating to a protected characteristic.

Possible indicators of discriminatory abuse

- The person appears withdrawn and isolated.
- Expressions of anger, frustration, fear or anxiety.
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic.

8.11 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.

8.12 County Lines

County lines is the name given to drug dealing where organised criminal groups (OCGs) use dedicated phone lines or other forms of 'deal line' to move and supply drugs, usually from cities into smaller towns and rural areas. This activity can happen locally as well as across the UK – no specified distance of travel is required. They exploit vulnerable people, including children and those with mental health or addiction issues, by recruiting them to distribute the drugs. This is often referred to as 'drug running'. Criminals may also use a vulnerable person's home as their base of operations. This is known as 'cuckooing'.

Children and adults at risk are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children and vulnerable adults can be targeted and recruited into county lines in a number of locations including education.

8.13 Social Media

Criminal networks use social media to groom and recruit children and vulnerable adults for county lines. They may send them direct messages (known as 'DMs'), or share messages to wider groups as 'stories' or 'posts'.

8.14 Cuckooing

OCGs often use high levels of violence and intimidation to protect the 'county line' and control them. One of these forms of control exploits vulnerable people by using their home as a base for dealing drugs, a process known as cuckooing. Dealers often convince the vulnerable person to let their home be used for drug dealing by giving them free drugs or offering to pay for food or utilities.

Often OCGs target people who are lonely, isolated, or have addiction issues. It's common for OCGs to use a property for a short amount of time, moving addresses frequently to reduce the chance of being caught.

Children and vulnerable people can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of indicators for Child Sexual Exploitation and Child Criminal Exploitation may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing and are subsequently found in areas away from their home.
- Have been the victim or perpetrator or serious violence (eg knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection.
- Are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiter.
- Have their bank accounts used to facilitate drug dealing.

8.15 Forms and Methods of Exploitation

County Lines exploitation can be perpetrated by individuals or groups of any gender or nationality and can appear unsophisticated or organised. It is typified by some form of power imbalance, which perpetrators use to force, coerce, groom and/or entice victims into county lines activity. They can employ several methods to do so, such as:

- offering an exchange – carrying drugs in return for something, such as money, clothes, drugs, status, protection or perceived friendship, a sense of belonging or identity, or affection;
- physical violence or threats of violence – used to intimidate and punish victims and their families and can involve weapons, including knives and firearms;
- abduction or kidnapping – sometimes victims are forcibly moved and held in a

location away from home;

- emotional abuse or psychological coercive control – by manipulating, threatening, controlling or monitoring the movements of the victim;
- sexual abuse and exploitation – this can be experienced by all genders;
- blackmail – by forcing victims to commit a crime so they can hold it over them and threaten to report it if they do not comply;
- the use of social media, messaging apps, gaming sites and other online platforms – including marketplace websites and smart TVs to target and communicate with victims. These modes are used by exploiters to falsely build online trusted relationships, or to post fraudulent job adverts which seem legitimate, or to cyberstalk victims in order to groom, entrap and coerce them into county lines activity;
- “cuckooing” (also known as “forced home invasion”) – a tactic used by criminals, typically drug dealers, to take over the homes of vulnerable individuals, such as care leavers or those with addiction, physical or mental health issues, and use the property as a base for criminal activity. This is a common characteristic of the county lines business model and can occur in a range of settings such as rental and private properties, student accommodation, prisons, and commercial properties;
- coerced internal concealment (also known as “plugging”) – the practice whereby a child or vulnerable adult is controlled or coerced into concealing drugs internally as a method of transportation to avoid detection. Drugs or sim cards are usually concealed within a condom or similar packaging and inserted into a bodily orifice (rectum or vagina) using lubricant, or swallowed;
- debt bondage – a form of entrapment when a victim owes money to their exploiters and is made to repay their debt, either financially or through another means such as transporting drugs. The exploiter may groom the victim by initially providing money or goods which the victim will then be made to pay back. The exploiter may also deliberately manufacture a debt, for example by staging a robbery of drugs or cash in the victim’s possession in order to extort money from families or to ensure the victim will continue to perform tasks for them. The debt may also be inherited from parents and siblings; and
- financial exploitation – financial exploitation can take many forms. In this context, we use the term to describe exploitation which takes place for the purpose of money laundering. This is when criminals target children and adults at risk and take advantage of an imbalance of power to coerce, control, manipulate, or deceive them into facilitating the movement of illicit funds. This can include physical cash and/or payments through financial products, such as bank and cryptocurrency accounts.

8.15 Missing Persons Linked to County Lines

Children and young people involved in county lines may go missing or be out of touch for long periods. During these times, they may be at risk of harm or violence.

9. Self-Harm and Suicidal Behaviour

If you are made aware that a learner has self-harmed, is going to self-harm or disclosing signs of suicidal behaviour, it should be reported to the safeguarding team immediately. The emergency services should be called if the learner is in any immediate danger.

10. Healthy Relationships

Staff should be aware that healthy relationships are about respecting each other, feeling comfortable and treating each other equally.

Consent is when one person agrees or gives permission to another person to do something. It means agreeing to an action based on your knowledge of what that action involves; its possible consequences and having the option of saying no.

When it comes to sex in a relationship, consent is extremely important.

What starts as an unhealthy relationship can become an abusive relationship. Learners 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.

11. Online, Digi Media and Social Media 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 take 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.

Sutton College staff should not be connecting with learners via personal social media accounts, including accepting friend / follow / connection requests via such platforms. This includes Whatsapp Groups. Any staff who engages in such activity may be the subject of disciplinary action.

If a member of staff becomes aware that another member of staff has learners linked to their personal accounts they should inform their line manager immediately.

Where curriculum or course related accounts or online spaces are used to communicate with learners the colleges Information Technology Systems Acceptable Use Policy and Social Media Policy should be adhered to.

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 immediately be automatically flagged with the College safeguarding officers. The learner can also email 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.

12. Online Bullying and Harassment

Cyberbullying or online harassment is offensive behaviour, based on protected characteristics, that makes a person or group feel humiliated, intimidated or degraded. It creates a hostile and offensive environment for all. The College has an ICT Acceptable Use Policy for Learners.

12.1 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.

13. 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.

13.1 Upskirting

Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is a specific criminal offence in England and Wales.

14. 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.

14.1 Female Genital Mutilation (FGM)

- FGM is a form of child abuse and violence against women and it is against the law in the UK.
- 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.
- The Female Genital Mutilation Act 2003 makes it illegal to:
 - perform FGM in the UK (regardless of age)
 - help or arrange for anyone to carry out FGM abroad on girls who are British Nationals or UK residents
 - help a girl to carry out FGM on herself
 - fail to protect a girl under 16 who is known to be at risk of FGM
 - FGM carries a penalty of up to 14 years in prison
 - all staff should speak to the designated Safeguarding Lead (or deputy) with regard to any concerns about female genital mutilation (FGM)

There are a number of signs a female could have been a victim of FGM:

- changes in behaviour
- missing College, particularly after a trip to a country where FGM is common
- spending long periods of time out of the classroom
- spending longer than usual going to the toilet
- avoiding going to the toilet
- discomfort when sitting down

- avoiding physical exercise
- frequent menstrual or urinary infections

Where in the course of their work in the profession, the person discovers that an act of female genital mutilation appears to have been carried out on a girl/woman, they must refer to the College Safeguarding team who will inform the police.

14.2 Breast Ironing/Flattening

Breast Ironing/flattening is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely."

In some families, large stones, a hammer or spatula that have been heated over scorching coals can be used to compress the breast tissue. Other families may opt to use an elastic belt or binder to press the breasts so as to prevent them from growing.

Breast flattening usually starts with the first signs of puberty, which can be as young as nine years old and is usually carried out by female relatives.

It should also be acknowledged that some adolescent girls and boys may choose to bind their breast using constrictive material due to gender transformation or identity, and this may also cause health issues.

What are the health consequences of breast flattening or breast ironing?

Due to the type of instruments that may be used, the type of force and the lack of aftercare, significant health and developmental issue may occur, such as:

- Abscesses
- Cysts
- Itching
- Tissue damage
- Infection
- Discharge of milk
- Dissymmetry of the breasts
- Severe fever
- Even the complete disappearance of one or both breasts
- There may also be an impact on the child's social and psychological development

Why do people practise breast flattening or breast ironing?

In many cases, the abuser thinks they are doing something good for the child by delaying the effects of puberty and the practice is designed to:

- make teenage girls look less "womanly"
- prevent pregnancy and rape
- enable the girl to continue her education
- prevent dishonour being brought upon the family if the girl begins sexual relations outside of marriage
- deter unwanted attention

Although there is no specific law within the UK around breast flattening or breast ironing, it is a form of physical abuse and if staff think that a learner has been subjected to Breast Ironing/Flattening, it should be reported to the Safeguarding team immediately.

14.3 Honour Based Violence

Honour-based abuse is a crime or incident committed to protect or defend the 'honour' of a family or community.

If the family or community think they have been shamed or embarrassed by the person behaving in a certain way, they may punish the person for breaking their 'honour' code.

People who carry out honour-based abuse are often close family members but also extended family or community members.

Types of honour-based abuse

There is not one specific crime of honour-based abuse. It can involve a range of crimes and behaviours, such as:

- forced marriage
- domestic abuse (physical, sexual, psychological, emotional or financial)
- sexual harassment and sexual violence (rape and sexual assault or the threat of)
- threats to kill, physical and emotional violence and murder
- pressure to go or move abroad
- being kept at home with no freedom
- not allowed to use the telephone, internet, or have access to important documents like your passport or birth certificate
- isolation from friends and members of your own family

Warning signs

Some warning signs to look out for:

- acting withdrawn or upset
- bruising or other unexplained physical injury
- depression, self-harming or attempted suicide
- unexplained absence or poor performance at school or work
- their movements at home are strictly controlled
- family rows, domestic violence
- running away from home
- a family history of relatives going missing

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

15. Incels

Incels are involuntary celibates. 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.

16. 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.

16.1. 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.

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.

16.2 PREVENT

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 member of staff who suspects a learner is at risk of radicalisation or has been radicalised should report the matter to the Safeguarding team immediately.

Spotting the signs of radicalisation

- isolating themselves from family and friends
- talking as if from a scripted speech

- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use
- spend increasing amounts of time talking to people with extreme views (this includes online and offline communication)
- change their style of dress or personal appearance
- lose interest in friends and activities that are not associated with the extremist ideology, group or cause

British values are embedded in all College activities and all College staff, learners and College stakeholders are expected to abide by these and tutors/managers will challenge any stakeholder who does not abide by these values and disciplinary action may be taken if necessary.

16.3 External Speakers Policy

The purpose of this policy is to ensure that open debate remains central to the culture of academic freedom and the development of learners' ideas and understanding without causing offence or harm to others. The College has an expectation that any visiting/guest speakers and those taking part in meetings or protest activities respect College values, and are sensitive to the diversity of its community and show respect to all sections of that community. Similarly, any event which is likely to give rise to an environment in which one could be at risk of radicalisation, fear, harassment, intimidation, verbal abuse or violence, particularly because of their ethnicity, race, nationality, religion or belief, sexual orientation, gender, disability or age, is also likely to be unlawful. As such, freedom to express views needs to be considered alongside existing safeguarding policies and procedures and the level of risk assessed and where possible reduced.

16.4 Channel

Channel is a voluntary, confidential programme which safeguards people identified as vulnerable to being drawn into terrorism. It is a multi-agency process, involving partners from the local authority, the police, education, health providers and others. The College Safeguarding Team will refer to Channel as necessary through the London Borough of Sutton Prevent and Hate Crime Officer.

The College communicates regularly with the FE Prevent Network and the local authority Prevent and Hate Crime Officer, the London Borough of Sutton Communications team and will make learners and staff aware of any local threats in the area.

17. Systems and Processes

17.1 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.

17.2 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.

17.3 The Director of Learner Services is the Designated Lead Officer for Safeguarding and Prevent. Other College Safeguarding Officers are the Principal and the Centre Operations Manager.

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.

College Safeguarding posters are throughout the building in classrooms, offices and toilets. Safeguarding information and reporting links are found on the College website, staff intranet and Student handbook.

<https://sites.google.com/suttoncollege.ac.uk/scintranet/helpdesks/safeguarding-reporting> - intranet help desk Safeguarding College intranet (Staff only)

<https://www.suttoncollege.ac.uk/students/safeguarding/> - Report a Safeguarding Concern (Website)

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.)

18. Working with Parents and Carers

The College will, in most instances, engage with both the victim's and the parents or carers of the alleged perpetrator(s) when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child or vulnerable adult at additional risk. The College carefully considers what information they provide to the respective parents or carers about the other person involved and when they do so. In some cases, local authority children's social care, Social services and/or the police will have a very clear view and it is very important for the College to work with relevant agencies to ensure a consistent approach is taken to information sharing.

Ongoing response

Safeguarding and supporting the victim.

The following principles are based on effective safeguarding practice and help shape any decisions regarding safeguarding and supporting the victim

- The needs and wishes of the victim should be paramount (along with protecting the child/ vulnerable adult) in any response. It is important they feel in as much control of the process as is reasonably possible. Important consideration should include the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the College's duty and responsibilities to protect other children/vulnerable adults.
- If the designated safeguarding lead (or a deputy) decides to go ahead and make a referral to local authority social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.
- Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the College is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegation(s) and the potential risk of further abuse. The College should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- The College should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- It will be important in all scenarios that decisions and actions are regularly reviewed and that any relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the College will decide on a course of action.

As always when concerned about the welfare of a child or vulnerable adult, all staff should act in the best interests of the child or vulnerable adult. In all cases the

College follows general safeguarding principles. Immediate consideration is given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children/ vulnerable adults involved/impacted).

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.

19. Safer Recruitment

Safer recruitment is a set of practices to help make sure the College staff and volunteers are suitable to work with children, young people and vulnerable adults. It is a vital part of creating a safe and positive environment and making a commitment to keep children, young people and vulnerable adults safe from harm. The College follows the London Borough of Sutton recruitment and selection policy.

A Single Central Register of staff is maintained by the HR Manager in line with statutory guidance within Keeping Children Safe in Education 2024.

20. Duty to Refer to the Disclosure and Barring Service (DBS)

When an allegation is made, an investigation is carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on [Gov.UK - DBS barring referral guidance](#).

There is a legal requirement for the College to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

The DBS will consider whether to bar the person. Detailed guidance on when to refer to the DBS (including what is the harm test and relevant conduct), and what information must be provided, can be found on [Gov.UK - DBS barring referral guidance](#).

Referrals should be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. It is important that as much relevant information is provided to the DBS as possible, as it relies on the quality of information provided by the College when considering the referral.

21. 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.

The College will always notify the police if guns, knives or drugs are found in a learner's possession.

Referencing / Signposting

External and internal policies and documents that have formed this policy -
<https://www.suttoncollege.ac.uk/college/missions-policies/>

Sutton College Visible ID Policy

Young Learners Policy

Sutton College Personal Data Protection policy

Modern Slavery Act 2015

Learner Code of Conduct

IT Acceptable Use Policy

No Secrets (Department of Health 2000)

Prevent Duty Guidance England & Wales 2023

Keeping children safe in Education 2024

Safeguarding Vulnerable Groups Act 2006

Metropolitan Police - Honour based abuse

Education Inspection Framework

Prevent Duty Guidance for Further Education Institutions in England and Wales

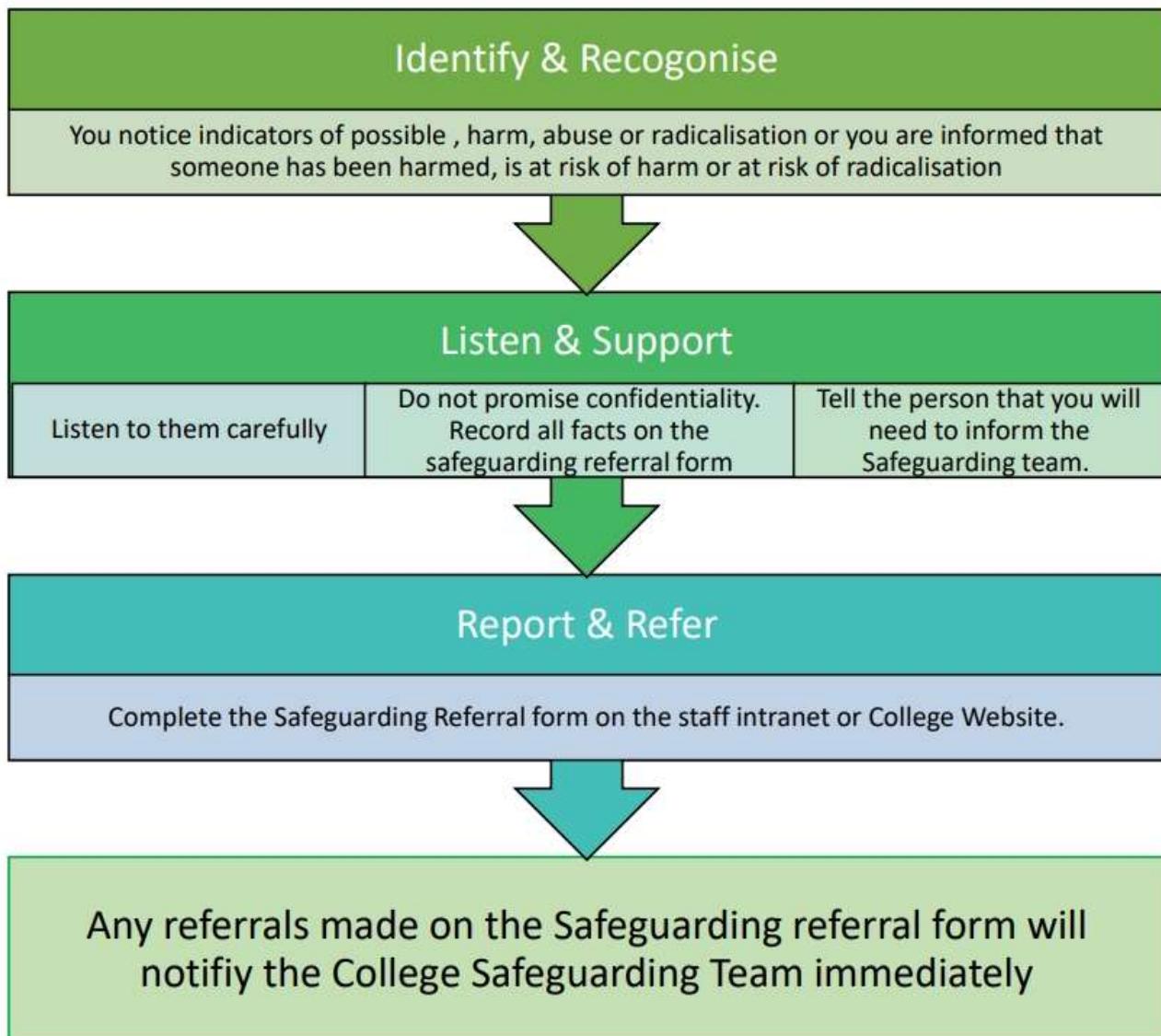
Working Together to Safeguard Children

Children Act 1989

Counter terrorism and Security Act 2015

Female Genital Mutilation Act 2003

Safeguarding & Prevent Referral Process



Email or Scan to make a referral

The safety and security of our learners and staff are of paramount importance to us. If you have any concerns about your own safety or that of another learner, please do contact a member of the Safeguarding Team using the form below or by emailing safeguarding@suttoncollege.ac.uk

