

# SAFEGUARDING POLICY & PROCEDURE

DOCUMENT CONTROL		
Policy number	PDTT001 v3	
Approval date	October 2023	
Review date	August 2024	
Policy owners	Designated Safeguarding Lead (DSL) Deputy DSL Head of Skills and Training	
Scope: applies to who	Learners, contractors, employers, visitors, teaching and support staff	



## **KEY CONTACTS**

ORGANISATION	ROLE	NAME	CONTACT DETAILS
	Designated	Semin Archidiacono	07791 044579
	Safeguarding Lead		safeguarding@pdt.org.uk
			semin@pdt.org.uk
	Deputy Designated	Lizzie Murrie	077930 11852
	Safeguarding Lead		safeguarding@pdt.org.uk
PDTT			lizziem@pdt.org.uk
	Head of Training &	Hoss Malek	0207 2668 242
	Skills		hoss@pdt.org.uk
		Out of normal	Semin - 07791 044579
		working hours	Lizzie – 077930 11852
			Hoss - 07852 319919
Subcontractor	Designated	Eamon Scanlon	07818 421521
Hammersmith	Safeguarding Lead		eamon.scanlon@lbhf.gov.uk
and Fulham	Deputy Designated	Sean Buckley	07900 737744
Council	Safeguarding Lead		sean.buckley@lbhf.gov.uk

(See <u>Appendix A</u> for Guidelines for Staff / Reporting Flow Diagram)



## CONTENTS

Introduction	
Scope	4-5
Aim	
Roles and Responsibilities	6-7
Staff Recruitment and Training	8 - 9
Learners Training	10
Other Parties – I.E., Employers, Visitors, Contractors, Volunteers	11
Handlin Incidents and Reporting	12-14
Linked Policies and Procedures	
Policy Review	15
Additional Resources	16
Appendices:	
A – Guidelines for Staff / Reporting Flow Diagram	17
B - Policy Aim Point 1: Keeping Staff and Learners Safe Inside/Outside Of PDTT	18
C – Policy Aim Point 2: Areas for Supporting Staff and Learners To Maintain Their	19
Own Safety/Wellbeing	
D – Policy Aim Point 7: Requirements Which Staff and Learners Need to Be Fully	20-21
Aware Of	
E - Protocols for Learners When Learning Online	22-23



## INTRODUCTION

The safeguarding of staff and learners at PDTT is the responsibility of all parties involved with the training provider. Our objective is to ensure that learners and staff are safe. We will ensure that staff working for, or on behalf of PDTT, understand their responsibilities in relation to safeguarding those at risk and know who to escalate concerns to within PDTT.

Safeguarding, along with the associated elements of Child Protection and the Prevent agenda are integral to all activities associated with the training provider whether on or off site, this also includes whilst working online. While PDTT work with adult learners, online filtering and monitoring remains an important element of safeguarding to protect staff, learners and the children/families of learners from potentially harmful and inappropriate online material that could be detrimental to their safety and/or mental wellbeing.

#### SCOPE

This policy applies to all who those working for or learning at PDTT (on site or remotely) or who enter the premises or conduct work remotely, it includes:

- All staff such as teaching and support staff
- Learners
- Contractors

Employers

• Visitors

#### AIM

PDTT aims to create a culture of safeguarding within its work and provision. By this, we mean an environment in which:

- Learner's welfare and safety is promoted.
- A timely and appropriate approach to safeguarding action is taken.
- Staff feel safe, understand their role in relation to safeguarding and that they are not afraid to challenge senior leaders over concerns.

Promoting safeguarding is embedded throughout the organisation. Aspects included under the 'umbrella' of safeguarding, and for which the training provider has a responsibility in supporting all learners and staff, and is committed to, include:

- 1. Improving and promoting best practice throughout PDTT ensuring that the wellbeing of staff and learners is safeguarded and that they are protected from harm (see appendices <u>B</u> & <u>C</u>).
- 2. Cultivating a culture of listening to learners and taking account of their wishes and feelings, both in individual decisions and the development of services. And to ensure that staff and learners:
  - a. Feel safe whilst undertaking activities organised by the training provider.
  - b. Know how to report instances of bullying and harassment and that reporting procedures are clear.

4 PDTT001 v3 October 2023



- c. Know how to report abuse including radicalisation and Female Genital Mutilation (FGM).
- d. Know what constitutes sexual harassment (see appendix D).
- 3. Ensuring safe, compliant and effective working practices are in place in order to protect the welfare of learners.
- To signpost learners to relevant services to make informed decisions on matters including alcohol; drugs; criminal activity; healthy living; relationships; harassment; sexual health; and other 'hot topics'.
- 5. Working in partnership with other external organisations to safeguard vulnerable and at-risk learners. And to assist and raise awareness of staff in understanding, managing, and supporting:
  - a. Learners with Learning Difficulties and Disabilities (LLDD).
  - b. Adults with Learning Difficulties and Disabilities (ALDD).
  - c. Learners from ethnic minority backgrounds.
  - d. English for Speakers of Other Languages (ESOL) learners.
  - e. Students with Mental Health issues (e.g. depression, anxiety, self-harm, emotional issues).
  - f. Children in Care (CIC), care leavers and young carers.
  - g. Young people seeking asylum.
  - h. Young Offenders/Rehabilitation of Offenders.
- 6. Learners with any of the Protected Characteristics: race; age; disability; sexual orientation; gender; gender reassignment; marriage and civil partnerships; pregnancy and maternity; religion and belief.
- To ensure that staff and learners are fully aware of the requirements of safeguarding and keeping themselves safe; child protection; wider abuse categories and sexual harassment (see appendix D)



#### **ROLES AND RESPONSIBILITIES**

## PDTT Personnel Responsible for Safeguarding

- 1. PDTT Designated Safeguarding Lead Semin Archidiacono
- 2. PDTT Deputy Designated Safeguarding Leads Lizzie Murrie
- 3. PDTT Head of Training and Skills Hoss Malek

The Designated Safeguarding Lead (DSL) has the lead responsibility for safeguarding and Child Protection with the organisation. They should promote a safe environment for all learners and staff within PDTT, and be aware of the issues relating to the welfare of any learners perceived to be at risk. It is their responsibility to ensure staff are aware of and understand safeguarding issues and know how to report concerns, including relating to online safety.

The other designated members of staff with responsibility are the Deputy Designated Safeguarding Lead and Head of Training and Skills. Both staff members are responsible for supporting the DSL in their legal responsibilities. They will assist the DSL with handling safeguarding issues; providing advice and support to staff; and liaising with a range of external agencies when needed.

The PDTT Governor's Committee has a Designated Governor with special responsibility for safeguarding issues. The designated governor is responsible for overseeing the effective implementation of safeguarding policy and procedures throughout PDT Training.

## Tutor/Assessor Responsibility

All staff are responsible for ensuring the safety and wellbeing of all learners and other staff members. However, tutors/assessors have a specific responsibility for the safeguarding of learners in their caseload. In line with their job role, they should ensure that:

#### They know their learners through:

- Examination of application, recruitment, and enrolment documentation.
- Understanding of initial assessment.
- Recognising behaviour and individual character traits.

#### They ensure that the following is in place in response to the above:

- Recommendation for change of programme, if appropriate.
- Additional Learning Support (Language, English, Maths), if appropriate.
- Signpost to external partners and services, as appropriate

All staff, but primarily tutors are required to help to protect learners when they are working online please refer to the Protocols set out in <u>Appendix E</u>. PDTT expect staff and learners to follow this guidance to remain as safe as possible (when learning) online.

6 PDTT001 v3 October 2023



## Managers, Internal Quality Assurers (IQA), Tutor/Assessors and Trainers Responsibility

Managers, IQA, tutor/assessors and trainers are responsible for knowing their learners and to identify if learners are at risk. Managers and IQAs will support with the following additional responsibilities:

- Learners at risk of not completing their programme are deemed to be 'at risk' this does not imply a risk of physical danger but relates to being at risk of dropping out of their course or not succeeding. Tutors should ensure that all parties involved in the learners' programme (e.g., Functional Skills) are informed of the needs of the learner and appropriate strategies are in place for managing those learners to maximise their opportunity for success.
- Where staff are not clear of strategies for managing 'at risk' learners, it is their responsibility to seek support and to undertake appropriate training to address their skills need through the staff development programme or by reporting the training need to their line manager and/or the Head of Training and Skills.

## **Confidentiality Policy**

Information discussed at work must be kept confidential unless something needs to be disclosed relating to a safeguarding concern. This information should be limited and needs to be referred to the Designated Safeguarding Lead in the first instance.



## STAFF RECRUITMENT AND TRAINING

#### Safe Recruitment

PDTT has clear procedures which must be followed by all managers employing staff. These are outlined in the PDT Recruitment and Selection Policy and the PDT Training Safer Recruitment Policy; these comply with the safeguarding statutory guidance outlined in Keeping Children Safe in Education.

PDTT will undertake appropriate recruitment and vetting checks on individuals who are being considered for employment working with children, young people, and adults at risk, and those who will be handling personal data and information. The process ensures compliance with guidance issued by the Department of Education, Ofsted, UK employment legislation and appropriate professional bodies.

#### **Induction of Staff**

All staff undergo an induction programme co-ordinated centrally. All staff are required to undertake Safeguarding, Prevent and Equality, Diversity and Inclusion training as part of their induction programme. It is the responsibility of the line manager of every new member of staff to confirm completion of this training prior to confirming their appointment at the end of their probationary period. All staff pre-employment vetting checks and regulated activity such as training and CPD activity will be recorded on the Single Central Register and reviewed/updated at minimum at the start of each term.

## There is a training provider requirement for all staff:

- To undertake safeguarding training, which includes Child Protection, and Prevent training at induction and mandatory annual updating.
- To undertake Equality, Diversity, and Inclusion (EDI) training at induction and two-yearly mandatory updating.
- To undertake Female Genital Mutilation (FGM) training two-yearly at induction and mandatory annual updating.
- To undertake online safety training at induction and mandatory annual updating.
- All of which will be monitored and recorded at appraisal; and through the Single Central Register.
- To undertake additional training as required, for example in response to changes to policies and procedures; individual roles within the training provider; or any substantial changes to legislation, in addition to any update training staff attend/provided.

#### Other training will include:

- Managers to undertake nationally recognised training.
- All staff involved in staff recruitment to undertake 'Safer Recruitment' training.
- Designated Safeguarding Leads to update training as stipulated by current guidance.



All staff are required to ensure that they are familiar with training provider, and PDT organisation wide policies and procedures related to safeguarding and Prevent including:

- Safeguarding strategy
- Child and Vulnerable Adults Protection
- Prevent
- Online Safety
- Harassment and Anti Bullying Policy
- Health and Safety
- Equality, Diversity, and Inclusion (EDI)
- Additional Learning Support
- Learner Disciplinary
- Employer Responsibility / Service Level Agreement
- Computer Use of Information and Learning Technology
- Learner Confidentiality and Data Protection
- Staff Code of Conduct
- Recruitment and Selection Procedures (incorporating Safer Recruitment)
- Confidential Reporting Code and Procedure (whistleblowing) for the investigation of irregularities
- Lone working
- Intruder / Lockdown
- Safeguarding Code of Conduct for Contractors, Visiting Trainers, and Volunteers
- Visitors Protocol
- External Speakers

## **Other Activities**

- A staff development programme that continually upskills staff in their understanding and application of safeguarding through all their activities.
- An effective introduction for employers to ensure responsibilities are highlighted.
- Policies and procedures that promote and reinforce safeguarding for staff and learners.
- An area on the PDTT ePortfolio and shared drive providing information for staff.
- An area on the PDTT website providing information and policies for learners.

#### LEARNERS TRAINING

#### Learner Induction

All learners must receive an induction programme that provides an effective introduction to safeguarding and Prevent. All learners must have the chance to understand safeguarding and Prevent, and be made aware of:

- The training provider's policies related to safeguarding and Prevent.
- Their responsibility for their own and others' safety.
- How to report any instances related to safeguarding, Child Protection or radicalisation or contact with extremist groups.



- Completion of the 'Side by Side'/Rise Module within the learner ePortfolio.
- Information Sharing in respect of Children, Young People and Vulnerable Adults.
- Guidance is available to support tutors in understanding issues around sharing information about young people and vulnerable adults.
- All sharing of information must comply with the Data Protection Act/GDPR.

## **Curriculum and Course Content**

Learners must be provided with an ongoing learning programme that embeds and reinforces all aspects of safeguarding and Prevent (such as specific discussion points and questioning).

Learner resources including information on:

- Learner safeguarding and Prevent
- Online Safety
- Respect



## **Employers and Partners**

The procedure for employers/work placements must be followed for all learners to ensure that all workplace Health and Safety has been checked. Learners and employers/work placements must be familiar with the requirements of safeguarding at work training.

Employers/work placements are issued with the training provider guidance on Safeguarding and Child Protection. This ensures that PDTT maintains its commitment to safeguarding its learners when engaged in activities related to their training programme. The guidance outlines what is meant by safeguarding, safeguarding measures that should be put in place and who to contact at the training provider regarding safeguarding or Child Protection concerns or questions.

In appropriate areas, where DBS checks are required, this is confirmed by the training provider and retained by the employer/work placement. Enhanced level checks are necessary for learners in specific areas and are carried out as needed.

#### **Contractors, Visitors, Volunteers and Returning Learners**

In the case of these groups, the training provider will make judgements of risk when offering contracts. The individual making these arrangements is responsible for ensuring that in the case of:

- 1. **Contractors** the employers have undertaken appropriate checks on its own staff and that they are fully aware of the Code of Conduct for Contractors.
- 2. Visitors including visiting Trainers/Volunteers must be accompanied from the reception area to the place of activity. Visiting trainers should not be left unaccompanied with learners at any time unless in the areas of the building open to the general public. Refer to the Code of Conduct for Visiting/Sessional Trainers and the Visitors Policy.
- 3. For the purposes of safeguarding, Volunteers should be treated as employees and must be DBS checked and a reference obtained.
- 4. **Returning learners (alumni)** must sign in as a visitor and be accompanied as per the Visitor Policy.



## **Referral Form / Process**

Tutors are to complete the electronic Jot Form (*Cause for Concern*) on the shared drive if they have a safeguarding, health and safety or other concern. The completed referral form automatically comes through to the Safeguarding Team for immediate action and follow up. Staff are to send the completed Cause for Concern form to the central safeguarding email address. The Designated Safeguarding Lead (DSL) and Deputy will follow up concerns and record these on the central database. If a learner needs to raise a concern directly, they will email the safeguarding email address or will contact the safeguarding team on one of the phone numbers provided.

If an individual has a concern relating to the DSL, or the DSL is not available – then they should contact the Deputy DSL directly.

If the Deputy DSL is not available, report to the Head of Skills and Training or the most senior person in the building.

#### **Responding to Safeguarding Disclosure and or Suspicion**

Where a learner at risk discloses or discusses potential abuse or harm the staff member should be able to; *Recognise, Respond, Reassure, Record and Report.* 

Safeguarding concerns should be reported to a Designated Safeguarding Lead. Examples of a safeguarding concern (but not exhaustive) include: if abuse is suspected or if a disclosure is made by a learner. PDTT will work in partnership with other agencies to ensure that concerns or allegations of abuse are appropriately referred for investigation to the most appropriate agency.

If the concern regards radicalisation a report should be made to a Designated Safeguarding Lead.

#### **Procedure for Dealing with Concerns**

PDTT staff who have regular contact with learners are well placed to observe significant changes in learner's behaviour, a failure to thrive, outward signs of abuse or behaviour which may indicate a risk of being drawn into terrorism or other concerns. In addition, learners may choose to share their concerns with staff they feel they can trust and with whom they are comfortable.

Staff need to know how to respond sensitively to a learner concern and who to approach for confidential advice.

Whilst PDTT staff are not responsible for investigating abuse, it is essential that any suspicions of significant harm, allegations of abuse, or concerns over potential radicalisation are acted on, and treated seriously.

PDTT takes a holistic view of the welfare of its learners and recognises that a wide range of contextual factors may be impacting on the wellbeing of a young person or adult at risk. These are likely to include family circumstances, friendship groups, the presence of specific vulnerabilities,

12 PDTT001 v3 October 2023



attendance and behaviour and learning differences. The safeguarding officer will consider the full picture in dealing with cases brought to their attention.

Please refer to <u>Appendix A</u> for guidelines to follow when dealing with a safeguarding concern.

**Dealing with Allegations of Misconduct Against Staff Under Safeguarding and Child Protection** All allegations must be reported to a Designated Safeguarding Lead as soon as a member of staff is aware of an allegation. PDTT has a legal duty to report concerns within one working day to the Local Authority Designated Officer

The member of staff may be suspended if it is considered that they or anyone else is at risk, or if there is good reason to believe the continued attendance of the member of staff cannot be permitted.

Where an allegation has been made against a member of staff, the Designated Safeguarding Lead should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of PDTT's procedures and/or policies. Consideration should also be given to the training needs of staff.

#### **Records of Reporting**

When a referral is made the Designated Safeguarding Lead will contact the individual and discuss the situation in more detail. They will then refer them to the relevant agencies within their local borough as required. Only the Designated Safeguarding Lead and the deputies have access to the referral forms.

The DSL will maintain regular contact with the individual via text, as authorised by the individual – this will not contain any sensitive information. The DSL will continue working with the individual until it is deemed resolved by the individual and the external agency they have been working with. Once a referral has been made, the Designated Safeguarding Lead will only intervene further if the individual has specifically requested their support and/or involvement – for example with contacting additional agencies.

All incidents and referrals are recorded on the Safeguarding Register – only the Designated Safeguarding Lead and the deputies have access to this. Once the matter has been resolved it is archived and the Safeguarding Register updated accordingly.

Safeguarding always forms a part of the Governor's Committee meetings – where the Head of Skills and Training will provide an overview/update on any ongoing matters and seek advice/guidance where necessary.

#### Data Management

The implementation of this policy requires the processing of personal and sensitive data of learners and/or members of staff. This will be done in accordance with the terms of Data Protection legislation as amended by the General Data Protection Regulations (2018) (GDPR) and as set out and

13 PDTT001 v3 October 2023



interpreted in PDTT's data management, storage, retention and disposal policies and related statements. The main requirements under the current legislation and PDTT's policy are as follows:

- Data subjects will be informed what data is being collected and for what purposes.
- Data will be stored safely and securely with robust access arrangements in place.
- Consent to share data will be requested where/when this is necessary.
- Data will only be shared on a need-to-know basis and using secure transfer mechanisms.
- Data will not be retained for any longer than is necessary.
- Digital and hard copy data will be securely destroyed when it is no longer needed, or the retention period has expired.



## LINKED POLICIES

This policy is a 'sub' policy for PDT Training for all learners and PDTT staff. Please also refer to the PDT wide Child Safeguarding Policy and Procedure and the PDT wide Vulnerable Adults Policy if safeguarding does not fall under PDT Training.

Policies also linked to this one include:

- PDT wide Recruitment and Selection Policy
- PDTT External Speaker
- PDTT Lone Working
- PDTT Prevent
- PDTT Whistleblowing
- PDTT Safer Recruitment Policy

#### **POLICY REVIEW**

The effectiveness of this policy will be kept under continuous review in the light of experience and best practice. This will involve consultation with staff, managers, learners when appropriate and the Safeguarding Officers.

The policy will be subject to annual approval by the Safeguarding Officers or as required should substantive changes be proposed in-year.



#### ADDITIONAL RESOURCES

<b>SAFEGUARDING &amp; PREVENT DUTY LINKS, GUIDANCE &amp; ADDITIONAL SUPPORT</b> For further guidance please refer to the following links		
AELP Association of	AELP   association of employment and learning providers - the voice	
Employment and Learning	<u>of providers</u>	
Providers	Access to training, advice and guidance surrounding Training and	
	Documentation needed for Prevent/Safeguarding	
AMA Wider Workforce	Understanding the wider public health workforce in England -	
Guidance on Safe Working	<u>GOV.UK (www.gov.uk)</u>	
Practice 2015 (PDF)		
Children's Act 1989	https://www.legislation.gov.uk/ukpga/1989/41/contents	
Children's Act 2004	https://www.legislation.gov.uk/ukpga/2004/31/contents	
Domestic Abuse Act 2021	https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted	
Disqualification Guidance 2022 (PDF)	New disclosure and barring services - GOV.UK (www.gov.uk)	
Education of Children 2021	https://www.legislation.gov.uk/en/ukpga/2021/16/enacted	
Education & Training	Prevent legislation, guidance and resources - The Education and	
Foundation – Guidance	Training Foundation (et-foundation.co.uk)	
information & Training support		
020 3740 8280.		
Fostering (KCC)- Allegations &	Allegations and Complaints Against Foster Carers	
Complaints Against Foster	(proceduresonline.com)	
Carers		
Government Links to Guidance	Prevent duty guidance: for further education institutions in England	
for FE Providers	and Wales - GOV.UK (www.gov.uk)	
КАТО	Kato-training.org	
	For Support and Training and Information. Courses offered by	
	Certified Providers and endorsed by KATO, Information to support on	
	measures that should be in place, updates on legislation.	
Keeping Children Safe in	https://www.gov.uk/government/publications/keeping-children-safe-	
Education 2023	in-education2	
Multi Agency Safeguarding Hub	https://www.gov.uk/government/news/working-together-to-	
(MASH)	safeguard-children-multi-agency-safeguarding-hubs	
(Schools) Statutory Guidance	https://www.gov.uk/government/collections/statutory-guidance-	
2018	schools	



## In the event of a safeguarding incident the following guidelines should be followed by staff:

- Stay calm and reassure the person that they are right to tell someone of their concerns.
- Do not promise confidentiality. Be honest. Explain who you need to pass the information on to and why (i.e. the appropriate person at PDTT who will seek further advice and help.) The learner can accompany you if they wish. Only the people who need to know will be told.
- Allow the learner to speak in their own way and at their own pace, avoid interrupting when they are recalling significant events.
- Do not be judgemental but make a professional assessment about the likelihood of harm occurring.
- Do not 'interview' the learner, do not ask leading questions. Factual questions are permitted to gather as much information as possible to create a full picture of what has happened so that this can be reported to a safeguarding officer.
- Only clarify what the learner is trying to say and ascertain whether there are any immediate issues of safety for them or others.
- Note as accurately as possible what was said, use the learner's own words and do not interpret what they are saying. Include the time, context, and location of the disclosure. Date and sign the notes. In addition to the learners add the address, date of birth, telephone contact.
- Do not investigate any suspicions, allegations, or incidents of abuse, but report them within the hour (or as soon as practicable) to a Safeguarding Officer and pass on all written notes.
- The Safeguarding Officer will seek advice from a Designated Safeguarding Lead who will then contact the local authority Children's and/or Adults Services, local Prevent Coordinator, or other agencies as appropriate.
- Where there is a concern that a learner is experiencing, may already have experienced abuse or neglect, is suffering or is likely to suffer 'significant harm' the Designated Safeguarding Lead will refer immediately to Children's/ Adults Services at the appropriate local authority.
- Where there is concern of a real threat to life emergency services must be contacted immediately.
- In exceptional circumstances if the Designated Safeguarding Leads are not available advice should be sought from the Directors or a member of the Senior Leadership Team, who will liaise with the required services as appropriate.





# <u>APPENDIX B</u>

## Keeping staff and learners safe within and outside of the training provider from:

- Radicalisation
- Accidents
- Crime
- Bullying and harassment including cyber bullying
- Maltreatment
- Domestic violence and bullying
- Financial abuse
- Discrimination abuse

Abuse – there are many categories of abuse which include areas such as physical (including breast ironing), emotional, sexual (including what constitutes sexual harassment) and neglect in addition to these you must be aware of how to identify the signs of the abuse categories outlined in the 'Keeping Children Safe in Education' document and how to respond and report on them. This includes the sharing of nudes consensually and non-consensually.

- Content being exposed to illegal or harmful content for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- Contact being subjected to harmful online interaction with other users, including commercial advertising and adults posing as children.
- Conduct Personal online harm, for example, making, sending, and receiving explicit images.
- Commerce (including online gambling and gaming).
- Child criminal and sexual exploitation and the differences between males and females. This includes non-contact activities, such as involving learners in the production of sexual images, forcing learners to look at them or grooming a learner in preparation for abuse, including via the internet.
- County line gangs and carrying knives
- Inappropriate peer on peer abuse including sexual harassment. Examples include (from a longer list including physical and sexual abuse), consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth-produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Initiation/hazing-type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- Protecting tutors /staff from allegations that are unsubstantiated, unfounded, false, or malicious reports which differentiate between allegations that meet the reporting threshold and those under the threshold considered "low-level concerns. If the report is determined to be unsubstantiated, unfounded, false, or malicious, the designated safeguarding lead will consider whether the learner or person who has made the allegation needs help or may have been abused by someone else and this is a cry for help.
- Mental health issues and improving well-being.



# APPENDIX C

## To support staff and learners to keep themselves:

- Healthy (including drugs/alcohol abuse, nutrition, exercise)
- Safe (Health and Safety, domestic violence)
- Cyber safe (mobile and Smart technology learners are made aware of the risks when using phones / Internet devices and what is and is not appropriate to share (sharing nudes). Learners receive a copy of the Learner Online Protocols for Keeping Safe (Appendix A), a Learner Handbook and a Learner Policy Handbook.
- Safe online (Apps, internet, text, photos, websites, safe from cyber bullying, grooming and radicalisation). Filters will be applied to search engines in line with recommendation from ESFA / GLA Prevent Lead and eSafety policy. Learners and staff receive a thorough induction to make them aware of the online safety risks included in the latest safeguarding legislation.
- Aware and informed of the child criminal and sexual exploitation risks and how this differs between males and females.
- Informed of strategies that county line gangs may use and awareness that learners may be vulnerable.
- Safe by acting against unsubstantiated reporting following PDTT's behaviour/ disciplinary policy.
- Mentally well with tutors providing additional support to learners as required and weekly well-being / check in sessions for staff.
- Direct meetings with Lead prevent officer from ESFA /GLA, DofE to ensure correct procedures, training and support is given



# APPENDIX D

## To ensure that staff and learners are fully aware of the requirements of:

- Safeguarding and keeping themselves safe
- Child Protection (the reporting of abuse or neglect)
- Wider abuse categories of child sexual exploitation, bullying including cyber-bullying, domestic violence, drugs, fabricated or induced illness, faith abuse, female genital mutilation, forced marriages, peer on peer abuse, gangs and youth violence, mental health, private fostering, radicalisation, nude sharing, teenage relationship abuse and trafficking
- Sexual harassment (flirting, gesturing, or making sexual remarks about someone's body, clothing or appearance, asking questions about someone's sex life, telling sexually offensive jokes, making sexual comments or jokes about someone's sexual orientation or gender reassignment, displaying or sharing pornographic or sexual Images, or other sexual consent, touching someone against their will, for example hugging them, sexual assault, rape or any behaviour of a sexual nature that is unwanted, it violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them).



# APPENDIX E

## Protocols for learners when learning online:

Tutors go through how to safeguard learners online during the induction session and continuously reinforce this during teaching and learning sessions and one to ones. The protocols devised below have been produced in conjunction with PDT Policies:

- To protect all learners, we ask that learners are appropriately dressed and ready to learn when logging onto your classroom session using Zoom or other eLearning platforms.
- To help us to ensure our learners safety online learners, wherever possible, are requested to turn on their cameras and to use them during the scheduled sessions or break out rooms. If learners are learning online and have the option available to blur or change their background on the screen for privacy, we encourage them to do so.
- We will contact learners if they are unable to attend classes including online lessons so that we can follow up appropriately and make sure that safeguarding procedures are followed. PDT will provide you the relevant contact details when you enrol.
- Learners must inform their Tutor if they are struggling to meet deadlines so that PDT is able to support them to try and meet requests.
- PDT will work with and will support the learners by providing one to ones and reviews, which will be scheduled as part of the course and support. This is to ensure that learners have the time and confidential space with their Tutor to review their needs and to provide further support if required.
- When learner's login to the PDT Laser eLearning platform, either on or off the premises, they will need to read and agree to the agreement pre-set by the relevant eLearning platform.
- We ask learners not to disclose their locations online and to not give away too many personal details.
- $\circ$   $\;$  Learners need to keep password logins safe and not to disclose these to anyone else.
- Learners should ensure that electronic devices such as mobile phones or Smart watches are not accessible and possibly turned off while they are engaged in online sessions, such as Virtual Classrooms or Tutorials/ one to ones.
- Learners are not to take photos of others while engaged in learning including using photos online in any context.
- Learners will be asked for their permission when the Tutor is going to record the class as they may be published online to support other learners that were not able to attend.



Tutorials/one to one session may also be recorded and uploaded to the individual learner portfolio to support learning and development.

- Learners are to report bullying online or that takes place on PDT premises. Tutors are to follow the Harassment and Anti-Bullying Policy in this regard to ensure that all learners feel safe.
- Learners are made aware at the time of enrolment that they will need use of a laptop or a work computer. The ePortfolio systems also work with mobile phones and iPads.
- Learners with any concerns or who feel worried should refer to the Designated Safeguarding Lead or Deputy: 0207 2668 242 /07791 044579 / 077930 11852 / 07852 319919 <u>safeguarding@pdt.org.uk</u>
- Learners are to be aware that the safe use of ICT is monitored on and off site for all learners' safety.