Sysco Group

Prevent and Safeguarding Strategy

Date: September 2022

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Introduction

This strategy covers the provision of Sysco Business Skills Academy and Brighter Futures Merseyside which sits under the umbrella of the Sysco Group.

Sysco is committed to achieving the highest standards of safeguarding and well-being of all learners and fully recognises its responsibilities for protecting vulnerable groups.

Sysco promotes a multi-agency approach which emphasises the need
to recognise the vulnerability of children and young people to radicalisation, work to safeguard those at risk, and work together to provide the skills, understanding and support to children and young people to make critical choices.

What does Safeguarding actually mean?

- Safeguarding is a proactive process of protecting and ensuring the safety and well-being of young and vulnerable learners & adults at risk, whether from crime, other forms of abuse or from being drawn into extremism activity.
- Safeguarding may involve instances in which a young or vulnerable learner is suffering or likely to suffer from harm, or at risk from radicalisation.
- Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with young or vulnerable learners.

What are the benefits of effective Safeguarding?

- When learners feel safe and secure, they can concentrate on learning.
- Learners can rely on those people in positions of trust.
- Staff are protected from malicious and misplaced allegations.
- Staff are clear about individual responsibilities, roles and boundaries.
- Learners are appropriately protected, and all issues are dealt with effectively.
- Learners and Staff are protected from risks associated with radicalisation and forms of extremism.

This Strategy applies to staff, learners, Sub-contractors, Employers, visitors and mutli agencies working on behalf of or in conjunction with the Sysco Group.

Sysco have a dedicated Safeguarding team that are responsible for reviewing and updating this strategy annually as well as accompanying policies, procedures and monitoring the impact of Safeguarding support.

Policies

Sysco has a number of policies and procedures in place specific to safeguarding. There are separate policies in place for Learners and Employees all of which are saved on the company intranet site to ensure staff have the most up to date records at all times.

Sysco promotes an ethos where young people feel secure, are encouraged to talk and are listened to. Sysco recognise the positive contribution it can make towards Objective 3 of the Prevent Strategy "supporting vulnerable individuals who are being targeted and recruited to the cause of violent extremism".

There are nine main elements to both policies, the Sysco Group will endeavour.
- To ensure the company operates safer recruitment practices in accordance with legislative requirements.

- To raise awareness of Safeguarding & Prevent throughout the organisation and ensure that staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe.
- To raise awareness of safeguarding to all learners and ensure that the learners who are most vulnerable are equipped with the skills and knowledge needed to keep them safe.
- To ensure employers are aware of Safeguarding & Prevent and provide guidance on policies to put in place.
- To continuously review and improve Safeguarding & Prevent procedures.
- Maintain safe environments in which vulnerable groups can learn and develop.
- To measure and monitor the impact of Safeguarding to support Learner achievement.
- To ensure prevent legislation and policies are effectively implemented.
- Where there are potential issues with learner attendance, key staff will liaise with the relevant emergency contacts and follow procedures. Also referred to in retention and achievement strategy.

It is our intention to ensure all Learners feel safe and have adequate information to allow them to raise concerns. Sysco will ensure that the priorities detailed are actively promoted.

In addition to the above and to support safeguarding and prevent at Sysco we will adhere to the following:

Counter Terrorism and Security Act 2015,
Section 26 Applies to schools and other providers;
To have due regard to the need to prevent people being drawn into terrorism.

Working Together to Safeguarding Children (2018) covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of Children. It also provides the framework for Local Safeguarding Children Boards (LSCB's) to monitor the effectiveness of local services, including safeguarding arrangements in schools.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

Prevent Duty Guidance – England and Wales covers the duty of schools and other providers in section 29 Counter Terrorism and Security Act 2015, to have due regard to the need to prevent people being drawn into terrorism.
https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales

Keeping Children Safe in Education (2022) sets out the legal duties you must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf

Responsibilities
It is the responsibility of all staff at Sysco and sub-contractors to be aware and promote the principals of the Safeguarding & Prevent policies and procedures. Sysco recognise and adhere to the statutory requirements within safeguarding legislation, and we will continue;

- Constitute and operate a Safeguarding Focus Team to be chaired by the Managing Director.

- Ensure there our Designated Safeguarding and Deputy Officers in place that will receive ongoing appropriate training and support for this role.
- Ensure the Safeguarding officer roles are communicated via our staff and learner induction process, internal training and awareness sessions, via the learner review process and via posters located throughout the centre.
- Continue to ensure that all staff are aware and understand their responsibilities in relation to Safeguarding and in being alert to the signs and indicators of abuse and radicalisation and for referring any concerns directly to the Designated Safeguarding Officer.
- Ensure all staff have read and understand part one of the statutory guidance "Keeping Children Safe in Education".
- Ensure health and safety is promoted at all learning sites, this includes adhering to updated government guidance.
- Ensure that effective Safeguarding procedures are developed, implemented, and monitored to ensure their effectiveness. These procedures are based on the 5R's approach of Recognition, Response, Record, Report, and Refer.
- Ensure that we develop effective links with relevant external agencies, local safeguarding boards and co-operate with any requirements with any safeguarding referral matters. Which would include Local Safeguarding Board, Local Prevent Officer and Local Police.
- Ensure that we keep written records of safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- Maintain up to date risk assessment following the 157 framework.
- We will monitor the impact of Safeguarding support during the Senior Managers and Safeguarding Meetings.
- Ensure all records are stored securely and in accordance with the Data Protection Act.
- We will robustly vet employers with regard to placement or work experience and pro-actively engage with these employers with regard to relevant policies.
- Refresher training will take place annually and Sysco will review staff Safeguarding qualifications every two years.
- All staff will complete up to date prevent training.

Furthermore, Sysco recognise that because of the ongoing contact with learners, staff are well placed to identify areas of concern. Staff and subcontractors should not seek to communicate/make contact or respond to learners outside of the purpose of their work. Staff and subcontractors should also not give out their personal details.

The Sysco Group will therefore;
- Establish and maintain an environment where learners feel secure and are encouraged to communicate with our staff.
- Staff and subcontractors working in one-to-one situations with learners should ensure that wherever possible there is visual access and/or and open door in one to one situations within the agreed setting. Always reports any situation where a learner becomes distressed or angry and consider at all times the needs and circumstances of the learner involved.
- All work with learners should usually be undertaken in the training setting or recognised workplace. There are however occasions, in response to an urgent or specific situation where it is necessary to make a home visit. This means all staff and subcontractors should; agree the purpose of any home visit with their manager, ensure any behaviour or situation which gives rise to concern is discussed with their manager, ensure that staff are not exposed to unacceptable risk. No staff or subcontractor that other than in an emergency they should not enter a home of a learner if they are under 18 years old and the parent/carer is absent.
- In certain situations, staff and subcontractors may be required or offer to transport learners as part of their work. Staff should not offer lifts to learners unless this has been agreed by a manager. Where possible and practicable it is advisable that transport is undertaken with one additional adult to the driver acting as an escort. Staff need to take into account the specific needs of the learner and ensure if they need to be alone with a learner this is for the minimum time.

- Staff to ensure learners know that there are designated staff within the company whom they can approach if they are concerned or worried.
- Include opportunities within our ongoing assessment process and classroom delivery for learners to develop the skills they need to recognise and stay safe.
- In taking photographs or videos with learner staff and subcontractors need to adhere to GDPR legislation and ensure signed consent is obtained.
- Ensure Employers are well informed and that they are actively committed to ensuring there are Safeguarding policies in place and Learners will be protected.

Safeguarding Procedures

Sysco recognises that effective procedures and systems are required to safeguard young and vulnerable people. To support this strategy, Sysco has a Safeguarding Policy for staff and a separate one issued to all learners as part of their welcome pack.

Sysco has a Safeguarding Focus Team, the team meets quarterly and is responsible for the implementation and continuous improvement of Safeguarding systems and procedures. The team is built up of the Managing Director, Senior and Middle management across the organisation, Human Resources, the Safeguarding and Deputy Officers.

As part of the induction process learners are given information on Safer Learning and a guide on what to do if they feel that their health, safety and general welfare is affected. All learners will be encouraged to complete prevent and radicalisation training in order to enhance their knowledge on radicalisation and extremism. Learners are also given an ICT policy, use of image form, a Training Agreement and guidelines on staying safe whilst online. Learners are also issued with a comprehensive list of support referral agencies. Sysco will continue to review this list on a regular basis to ensure it remains current.

The ICT policy has been revised to incorporate any associated risks with radicalisation and extremism. Sysco has also obtained advice from an appropriate external organisation on enhanced web filtering systems and has developed systems due to this, resulting in less associated risks with staff and learners accessing extremist material. Due to the increased presence of remote and virtual learning with learners, staff must adhere to the following when using a virtual learning platform with learners:
- Where possible a waiting room should be used at all times.
- The virtual teaching room should be locked with the teacher having the facility to remove participants should the situation arise.
- Learners should not be able to meet on the virtual learning platform without a teacher/staff member present.
- Staff should be able to see all learners present on the device that is being used.
- Recommend recording sessions for everyone's safety. All staff should advise learners at the start of the session of the intend to record and clarify everyone present has understood.
- It is also recommended a digital survey with learners is undertaken to assess at home online learning capabilities and they have a device that is suitable for online learning.

Employers are provided with IAG and where required support on implementing a Safeguarding Strategy.

Training Advisors & Tutors hold the responsibility for ensuring learners fully understand the information and are aware of Sysco's commitment in Safer Learning and promote awareness as part of the Learner Review process, using Hot Topics and also by learners completing learning on Safeguarding and Prevent.

Sysco's Safeguarding Officers are responsible for providing information, advice and guidance to staff on Safeguarding issues. They will ensure complaints of abuse, unfair treatment, harassment, bullying or suspected radicalisation continues to be dealt with promptly and in accordance with set procedures.

Sysco will endeavour to ensure employers are provided with information on safer learning, the primary purpose of this is to raise awareness; disseminate 'best or better' practice and confirm the respective rights and responsibilities with all related stakeholders.

Sysco will ensure that sub-contractors working with young, inexperienced or vulnerable people have appropriate procedures and systems in place to ensure they comply in the same way as Sysco and review procedures, practices and safe systems to ensure compliance. Sysco will also ensure DBS checks take place and are monitored where necessary. Where identified individual risk assessments may be undertaken to prove the company's commitment to health and safety and to ensure that suitable arrangements are considered and implemented prior to the young or vulnerable person starting work.

Learning Materials

Sysco will develop Safeguarding resources on an ongoing basis. We will ensure that learning materials are consistent with the principals of Safeguarding and Prevent Policies and that the material is appropriate to the Learner needs.

Learning Material will be used to raise awareness of Safeguarding to young people and adults at risk. Safeguarding, British Values, Prevent, Equality & Diversity, Mental Health and Digital Skills awareness will also flow through the delivery of the programme. A broad and balanced curriculum is available which also includes personal development and relevant issues such as relationship education.

The learner Review process will be used to clarify the understanding of Safeguarding and check Learner well-being.

All Staff will have appropriate Safeguarding Training, which will be reviewed annually.

In 2022 all staff have completed further Safeguarding, Prevent and Radicalisation training, all members of staff and the board have completed safeguarding training for training providers course online. The Safeguarding Focus Team have also all attended L3 Advanced Safeguarding Training for Designated Leads in 2018 and in March 2021 completed further advanced safeguarding awareness training. During 2019 all staff completed The Home Office Prevent training module and this is currently being reviewed with further training being considered in 2022. The Safeguarding Officers also attend regular spotlight sessions arranged by the Liverpool Safeguarding Children's Partnership and receive regular updates from external agencies such as NSPCC, LSCP. Sysco will also ensure that Learners on all programmes complete training to raise their knowledge.

Communication

Safeguarding forms part of the Company Communication Strategy. The focus team meet quarterly to review the aim of the strategy and ensure systems and procedures are reviewed.

A number of people have clearly defined roles and responsibilities in relation to child protection, appropriate to the level at which they operate. These duties will be reviewed annually.

CPD of Safeguarding will be monitored by HR and the Safeguarding Officer; updates will be communicated during full team meetings.

Safeguarding Officers and the Safeguarding Focus Team review and update the safer learning procedures and communicate this with all staff. Ongoing developments will be discussed at team meetings and forwarded to higher management for consideration. It is the responsibility of all Sysco employees who have young, inexperienced or vulnerable persons in their care to ensure that learners feel safe and happy whilst learning with Sysco and report any concerns as they arise.

Ongoing developments will be discussed at Sub-contractor meetings. Subcontractors will continue to be monitored to ensure their systems and procedures are updated and in order.

Employers will be given an introduction into safer learning as part of the Employers guide with relevant information and guidance on dealing with issues and the assigning of responsibilities. Employers will be encouraged to request support from Sysco if necessary and provide feedback if they feel it is appropriate.

Learners within Sysco's care will be allocated a Training Advisor or Tutor to support Sysco's Personal Development and Wellbeing Framework.

- Sysco will continue to promote health and wellbeing, safety awareness and empowering learners with learning which could encompass; physical and mental health, sexual health, drugs awareness, alcohol awareness, resilience , equality and diversity, safe from accident or injury, safe from abuse, safe from bullying and discrimination, being safe online, enjoying & attending, good educational standards, achieving qualifications, excellent support facilities.
- Sysco are working in partnership with other organisations in relation to child protection and will support this commitment by providing training to key staff to help and support learners with any issues they may face.
- Employer Responsiveness – Sysco will provide ongoing information, advice and guidance to raise awareness of Safeguarding. Sysco will ensure Learners are aware of Safeguarding procedures and the route to follow when raising concerns.
- Sysco will continue to monitor sub-contractor safeguarding systems, procedures and incident handling. Sysco will also share best practice with sub-contractors to ensure that all learners are aware of the support available to them.

Monitoring of Safeguarding and Prevent Strategy

Sysco will monitor the impact of the Safeguarding Strategy and Policies during the Senior Managers and Safeguarding meeting.

Records of Safeguarding incidents will continue to be audited regularly to assess the support provided and establish if the correct procedures have been followed. Results of audits will be logged and common themes or areas of improved will be addressed on an ongoing basis.

Sysco will continue to log and monitor the volume of Safeguarding incidents and the impact of the support provided. Safeguarding data will be analysed by the Senior Management and Safeguarding teams. Where necessary improvement action plans will be put in place.

Sysco will produce data on safeguarding to assess the impact of support and where necessary improve systems and procedures.

Safeguarding Information, Advice and Guidance
How do we define Young / Vulnerable learners?

- Young learners are defined as any learner who has not yet reached their 18th birthday
- The Safeguarding Vulnerable Groups Act SVGA (2006) no longer labels adults as 'vulnerable' because of the setting in which an activity is received, nor because of the personal characteristics or circumstances of the adult receiving the activities.

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 Identifies the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at that particular time.

Definition and types of Abuse and/or Neglect
This section closely reflects the procedures and guidance in the Liverpool Safeguarding Children Board and the Home Office document "*Working Together to Safeguard Children*" 2018.

'Child abuse and neglect' is a generic term encompassing all ill treatment of young and vulnerable learners, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the persons health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable learner. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm.

Young or vulnerable learners may be abused in the family or an institutional or community setting by those known to them or, more rarely, by a stranger. An adult or adults or another child or children may abuse them.

The four broad categories of abuse are:
- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

Physical Abuse

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

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their development. It may involve conveying to the person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed in them.

These may include interactions that are beyond the person's developmental capacity, as well as over-protection and limitation of exploration and learning, or preventing them participating in normal social interactions. It may involve serious bullying causing the person frequently to feel frightened or in danger, or the exploitation or corruption of persons. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including Prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving them in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging sexually inappropriate behaviour.

Neglect

Neglect involves the persistent failure to meet person's basic or physical and/or psychological needs, likely to result in the serious impairment of the person's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a person from physical harm or

danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsive to, a person's basic emotional needs.

Additional types of abuse and unsafe activities which we recognise and which have become more prevalent in recent times are:

- Bullying and Harassment
- Alcohol and Drugs
- Crime
- Cyber Bullying
- Discriminatory Abuse
- Financial Abuse
- Domestic Violence

Identifying Indicators of possible abuse

When considering whether there is enough information and evidence to suggest a young or vulnerable learner has been abused, there are a number of possible indicators. However there may also be a perfectly reasonable explanation so it is important to remain vigilant but not be over zealous nor jump to conclusions. There may also be no signs or indicators or abuse, however this does not necessarily mean that a report of abuse is false.

Identifying Indicators of physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries that have occurred on parts of the body which are unusual and not indicative of a fall or because of playing a contact / rough sport etc
- Injuries that have not received medical attention
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, unkempt appearance, dirty clothes etc
- Changes in routine.

Identifying Indicators of sexual abuse

- Any allegation made by an individual
- Individuals with an excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour
- Sexual activity through words, play or drawing
- Individuals who are sexually provocative or seductive
- Severe sleeping disorders
- Eating disorders

Signs suggesting emotional abuse

- Changes or regressions in mood or behaviour
- Nervousness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Attention seeking behaviour
- Persistent tiredness
- Running away

The following indicators also need to be considered:

Identifying Indicators of radicalisation
- Being overly secretive about online viewing
- Displaying feelings of isolation or expressions of an 'us and them'
- Becoming more argumentative or domineering in their viewpoints, being

quick to condemn those who disagree and ignoring views that contradict their own
- ▪ Questioning their faith or identity.
- ▪ Downloading or promotion extremist content.
- ▪ Social isolation – losing interest in activities they used to enjoy, distancing Themselves from friends and social groups
- ▪ Altered appearance – change in style of dress and/or personal appearance.
- ▪ Abnormal routines, travel patterns or aspirations

Some current Issues

The Use of Technology
The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.
- ▪ https://www.disrespectnobody.co.uk/ is Home Office advice and includes resources on healthy relationships, including sexting and pornography
- ▪ https://www.gov.uk/government/publications/education-for-a-connected-world   from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety
- ▪ https://www.thinkuknow.co.uk/   is the National Crime Agency/CEOPs education programme with age specific resources

Sexual Violence & Sexual Harassment between schools and colleges

This is advice provided by the Department for Education. Its focus is child on child sexual violence and sexual harassment at schools and colleges (peer on peer abuse). The advice covers children of all ages, from the primary through to secondary stage and into colleges. For the purposes of this advice, a child is anyone under the age of 18. Whilst the focus of the advice is on protecting and supporting children, schools and colleges should of course protect any adult students and engage with adult social care, support services and the police as required. The advice sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur, or is alleged to have occurred. The advice highlights best practice and cross-references other advice, statutory guidance and the legal framework.

Sysco will follow the updated guidance:

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

Sharing nudes and semi nudes

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. This advice does not apply to adults sharing nudes

or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

Sysco will follow the updated guidance:

[Sharing nudes and semi-nudes: how to respond to an incident (overview) - GOV.UK (www.gov.uk)](www.gov.uk)

Sexting

Sexting is the sending of provocative or sexual photos, messages or videos. They are generally sent using a mobile phone but can also include posting this type of material online. While sharing suggestive images or text messages may seem like innocent flirting or be considered funny for young people, sexting can have serious social and legal consequences.

Sysco will follow the updated guidance;

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB__1_.PDF

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, buttocks or underwear. Perpetrators can face two years in prison and most serious offenders placed on the sex offenders register (Voyeurism Act, April 2019).

https://www.gov.uk/government/news/upskirting-know-your-rights

Revenge Porn

Revenge Porn is the sharing of private, sexual materials, either photos or videos, of another person, without their consent and with the purpose of causing embarrassment or distress. Those found guilty of it, can be sentenced to up to 2 years in prison and a fine.

https://www.gov.uk/government/publications/revenge-porn

Domestic Violence (including coercive control)

Domestic abuse is a pattern of behaviour on the part of the abuser designed to control their partner. It can happen at any point in a relationship, including after you have split up. Anyone forced to change their behaviour because they are frightened of their partner or ex-partner's reaction is experiencing abuse. Domestic abuse is a crime.

https://www.nationaldahelpline.org.uk/What-is-abuse

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is a continuing act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/482528/Controlling_or_coercive_behaviour_-_statutory_guidance.pdf

Child Sexual Exploitation CSE

Involves exploitative situations where a child, male of female, receives something from an adult as a result of engaging in sexual activity. This can be seemingly 'consensual' relationships to serious organised crime gangs. There will be an imbalance of power where the perpetrator holds power over the victim. Technology is often used. This is a serious crime. The police team can be contacted for extra support and information.

Sysco will follow the updated guidance;
https://www.met.police.uk/advice/advice-and-information/caa/child-abuse/child-sexual-exploitation/

Criminal Exploitation of children and adults at risk

Criminal exploitation of children and adults at risk is a geographically widespread form of harm that is a typical feature of county lines activity. County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money.

Sysco will follow the updated guidance;

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/626770/6_3505_HO_Child_exploitation_FINAL_web__2_.pdf

Modern slavery and human trafficking
Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Sysco will follow the updated guidance;

https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking

Private Fostering

Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'. The local authority need to be satisfied that the placement is suitable and the child is safe

Sysco will follow the updated guidance;

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children_Act_1989_private_fostering.pdf

Honour Based Violence HBV – e.g. FGM/Forced Marriage.

Female Genital Mutilation FGM

This is illegal and a form of child abuse. It involves a procedure to remove all or some of the female genitalia or any other injury to these organs. A mandatory reporting duty for FGM requires regulated health and social care professionals and teachers in England and Wales to report known cases of FGM in under 18-year-olds to the police. The FGM duty came into force on 31 October 2015.

Multi agency guidelines;

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800306/6-1914-HO-Multi_Agency_Statutory_Guidance.pdf

Forced Marriage

Is illegal and a form of child abuse. A marriage entered into without the full and free consent of one or both parties, where violence, threats or coercion is used.

Multi agency guidelines;

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf

Safer Recruitment Processes

Sysco will take all possible steps to prevent unsuitable persons working with young or vulnerable learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2007) and the Safer Practice, Safer Learning document produced by NIACE.

When interviewing potential staff we will ensure that:
- There is an open recruitment process
- There is a rigorous interview with specific questions relating to Safeguarding
- Applicants identity and claims to academic or vocational qualifications will be verified
- References will be taken up by direct contact with referees
- Evidence of the date of birth and address of the applicant will be obtained

Enhanced Disclosure and Barring Service Check (DBS) will be conducted in all instances.

All applicants will complete an application form enabling each of them to have the same opportunity to provide information about themselves and assist in identifying any gaps in their employment history.

Post Appointment

All staff will take part in an induction programme which will vary dependent on the nature of the role. The purpose of this will be to:
- Provide awareness and explanations of relevant policies and procedures
- Provide support for the role in which they have been engaged
- Provide opportunities for a new member of staff to ask questions or discuss concerns relating to their role or responsibilities
- Enable individual line managers and colleagues to recognise any concerns about the person's ability or suitability from the outset and address them if deemed appropriate

- Ensure that individuals are aware of reporting concerns and who the Designated Persons for Safeguarding are
- Ensure that individuals are aware of other relevant policies and procedures; i.e. disciplinary procedure, E&D Policy

Steps to take following a young or vulnerable learner confiding about or suspecting a case of abuse or neglect

Where a young or vulnerable learner seeks out a member of staff to confide in and share information about abuse or neglect or talks spontaneously individually or in groups, our staff will:
- Listen carefully to them, don't directly question him/her Give them time and attention.
- Allow the person to give a spontaneous account; do not stop a person who is freely recalling significant events.
- Make an accurate record of the information given taking care to record the timing, setting and people present, the person's presentation as well as what was said. Do not discard this as it may be later needed as evidence.
- Use the persons own words where possible.
- Explain that they cannot promise not to speak to others about the information they have shared.

Reassure the person that:

- You are glad that they have told them
- That he / she has not done anything wrong
- What you are going to do next
- Explain that help will need to be sought to keep them safe
- The person should be asked NOT to repeat his / her accounts to anyone.

<u>The Designated Person for Safeguarding must be informed immediately</u>, who will investigate the concern and take appropriate action, all records of the investigation, will be kept strictly confidential and stored in a secure place.

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately. If the designated person for safeguarding has concerns regarding a young person or adult at risk welfare they should share the information with the appropriate agencies in line with the Sysco Group and local procedures. Security of information sharing must always be considered. If it is considered a crime has been committed if the child or adult at risk is at immediate risk, the police should be notified immediately.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

Steps to take when dealing with allegations against staff

This applies should anyone have concerns regarding inappropriate behaviour by a member of staff where they have:-
- Behaved inappropriately in a way that has harmed or may have harmed a learner.
- Possibly committed a criminal offence against or related to learner.
- Behaved towards a learner in a way that indicates he/she is unsuitable to work with them.

The Designated Person for safeguarding should be informed of the matter immediately. (Where the Designated Person nominated for safeguarding is involved in the allegation, the most senior member of staff should be informed).

A formal review will take place which:
- ■ Will determine if the police need to be involved immediately to protect the person further.
- ■ A referral will be made to the LADO (Local Authority Designated Officer). The LADO will:

  - manage and have oversight of individual cases.
  - Provide advice and guidance to employers and voluntary organisations.
  - Liaise with the Police and other agencies.
  - Record referrals appropriately.
  - Monitor the progress of cases to ensure they are progressed in a timely way with a fair and consistent process.
  - Chair multi agency allegation management meetings, when they are required.

The role gives all agencies a central point of contact for them to discuss and make notifications falling within the Local Authority Designated Officer threshold criteria. For more information: **https://liverpoolscp.org.uk/scp/local-authority-designated-officer-lado/what-is-the-lado-and-what-do-they-do**

- ■ Will record all details received and secure them safely.
- ■ Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and free from victimisation.
- ■ Will determine whether suspension is appropriate whilst undertaking the investigation, with guidance from the LADO.

All allegations will be acted upon, however due to the variance in the risk levels, all allegations will be treated individually and the appropriate actions assigned on a case by case basis with guidance from the LADO.

Anonymous Allegations

Concerns raised anonymously tend to be far less effective, and depending on the level of information, the matter may not be investigated at all.
The decision taken to investigate the matter further will depend upon:
- ■ The seriousness of the matter.
- ■ Whether the concern is believable.
- ■ Whether an investigation can be carried out on the information provided.

Staff Code of Conduct

The code of conduct should guide all actions taken by staff and anyone else working on behalf of The Sysco Group. If it is necessary to act contrary to it (for example visiting a learner in their home) you should only do so after discussion and approval with your line manager.
- ■ Place the safety and well-being of learners first – before any organisational or personal goals and before any loyalty to colleagues and friends
- ■ Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is, or may have been inappropriate
- ■ Be committed to actively preventing the exploitation and abuse of young or vulnerable learners
- ■ Respect all individual learners regardless of any protected characteristic (as defined within the Equality Act 2010), ability and treat each individual learner with respect and dignity.
- ■ Respect each learners boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do if they feel there is a problem.

The focus of your relationship with a learner you have met through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship and you should avoid socialising with learners on occasions where it does not constitute part of your normal duties and avoid establishing relationships through the use of social media such as Face book or Twitter.

It is essential to have guidelines to follow in order to minimise the possibility for abuse, misunderstanding and misinterpretation. False and malicious allegations are rare but general good practice will help prevent them. The following examples will help to create a positive, transparent culture and climate.

Maintain a safe and appropriate emotional and physical distance from young or vulnerable learners.
- Do not make sexual or discriminatory comments of any kind
- Engage in rough or sexually provocative games
- Make sexual comments / innuendos
- Lending or borrowing money or property
- Exclusive or secretive relationships
- Inviting young or vulnerable learners into your home
- Inappropriate reading materials / internet use

Confidentiality and sharing information

Staff will only discuss concerns with a member of the safeguarding team or Managing Director. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The Seven Golden Rules for Safeguarding Information Sharing 2015

- Data Protection/Human rights laws are not a barrier.
- Be open and honest. (unless unsafe or inappropriate)
- Seek advice. (anonymise if necessary)
- Share with consent if appropriate.
- Consider safety and wellbeing.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure.
- Keep a record of decision and reason for it.

https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

The Data Protection Act does not prevent staff from sharing information with relevant agencies, where that information may help to protect a child. Ideally information sharing will be done in writing so that there is an evidence trail . Where information is shared the DSL will ensure they can identify who is requesting the information before sharing and then record what has been shared, when, why and with whom.