YOUNG PEOPLE SAFEGUARDING POLICY

INTRODUCTION

This policy applies to all staff and parties working with participants of Sutton Trust programmes on activities organised and/or delivered by the Trust. This includes senior managers, trustees, board members, Fellows, paid staff, freelance contractors, volunteers, work experience providers and visitors to our programmes (such as donors) or anyone working on behalf of The Sutton Trust.

In the case of a partner organisation using their own safeguarding policy, this should be of similar standard to that of best practice for the sector.

The Sutton Trust believes that a child, young person or vulnerable adult should never experience abuse of any kind. We all have a responsibility to promote the welfare of all children and young people and to keep them safe both on our face-to-face programmes and online. We are committed to practice in a way that protects them.

The purpose of this policy:

a) to protect participants including children, young people and vulnerable adults who take part in our programmes and events
b) to provide staff and those to whom this policy applies with the overarching principles that guide our approach to child protection and protect them from unfounded accusations or from behaving in ways which may be well intended but inadvisable
c) to ensure that where personal data is processed for the purposes of safeguarding that appropriate measures are taken to provide for our lawful obligations including but not limited to the use of the lawful bases. It is likely in such circumstances that special arrangements will be required and therefore this policy included an appendix for an Appropiate Policy Document (APD).

The policy will be reviewed annually by Director of Programmes, with recommendations for changes signed off by the Chief Executive and reported to the Board of Trustees.

A) DEFINITIONS

Child is someone under the age of 18

Child abuse is when any child is being harmed. Abuse can include physical, sexual, or emotional abuse, or take the form of neglect.

Working with children is defined as those who are engaged in an activity on behalf of or funded by us that involves direct contact with, or facilitates access to, children.

Vulnerable adults are those people over 18 years who are or may be, for any of a variety of reasons, unable to look after themselves or protect themselves from harm or exploitation

Participant/ student refers to individuals that take part in a Sutton Trust programme. Some participants are under 18 and others are over 18. The procedures outlined in this policy apply to all participants.

B) LEGAL FRAMEWORK

Last updated 19/10/2022 by Laura Bruce and Sara Bram

This policy has been based on law and guidance that seeks to protect children, namely:
- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 2018
- Sexual Offences Act 2003
- Children Act 2004
- Protection of Freedoms Act 2012
- Working Together to Safeguard Children 2015
- Relevant government guidance on safeguarding children

- Online abuse learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse
- Bullying learning.nspcc.org.uk/child-abuse-and-neglect/bullying
- Child protection learning.nspcc.org.uk/child-protection-system

C) WE RECOGNISE THAT:

- The welfare of the child is paramount, as enshrined in the Children Act 1989
- All participants, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse
- Some participants experience additional vulnerabilities to abuse, and/or additional barriers to recognising and reporting abuse.
- Our face to face and online programmes present opportunities for young people; however they can also present challenges and risks
- The risks of face to face and online programmes are not always the same and both need attention
- All staff and volunteers who come into contact with participants have a duty to remain alert to their needs and any risks of harm
- The Sutton Trust's staff and Trustees have a responsibility to report concerns about any participant or adult to the relevant authorities

D) WE WILL SEEK TO KEEP PARTICIPANTS AND YOUNG PEOPLE SAFE BY:

- valuing them, listening to and respecting them
- appointing Designated Safeguarding Officers (DSO)
- adopting child protection practices through procedures and a code of conduct for staff, volunteers, trustees and donors
- developing and implementing an effective online safeguarding policy and related procedures. These procedures are outlined in Section 6 of this policy, and in our online safeguarding workflow
- reviewing and updating the security of our information systems regularly
- ensuring that user names, logins, email accounts and passwords are used effectively
- ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- ensuring that images of children and young people are used only after their written permission has been obtained, and only for the purpose for which consent has been given

- providing effective management for staff through supervision, support and training
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- sharing information about child protection and good practice with children, parents, staff and volunteers
- Sharing concerns with agencies who need to know, and involving parents, carers and children appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring we have effective complaints and whistleblowing measures in place
- Ensuring organisations that run programmes on our behalf or in partnership with us have safeguarding policies in place, follow the highest level of practice and take all possible steps to limit the likelihood of abuse towards participants and vulnerable adults

Responsibilities

The Sutton Trust have appointed two Designated Safeguarding Officers, and two Deputy Safeguarding Officers who are trained by NSPCC. They will be supported by the Chief Executive, who reports directly to Trustees. See section 4c for further details of the roles.

Designated Safeguarding Officers	**TBD** Director of Programmes Out of hours: 07495023259	**Sara Bram** Programmes Manager (residentials) sara.bram@suttontrust.com
	Policy, training, serious case management and investigation sign off	Policy review, internal training, policy implementation, case management
Deputy Safeguarding Officers	**Jonny Tyndall** Head of University Access Programmes jonny.tyndall@suttontrust.com	**Katherine Hale** Head of Employability programmes (maternity) Katherine.hale@suttontrust.com
	Policy implementation and case management	
Senior lead	**TBD** CEO	
	Serious incident sign off, cases involving staff members, reporting to Trustees	

In any interim period of absence of CEO and/or Director of Programmes, the Senior leadership team (SlT) will take on the Safeguarding lead role to support DSOs with decision making, risk management and reporting to charity commission, where needed

Key contacts
- **City of Westminster Access Team**: 020 7641 4000 (Out of hours – 020 7641 6000) Email: AccesstoChildrensServices@westminster.gov.uk
- **To find contact details for child services in other local councils***: https://www.gov.uk/report-child-abuse-to-local-council
- **NSPCC 24-hour helpline:** 0808 800 5000
- **City of Westminster Adult Social Care** (for safeguarding concerns regarding vulnerable adults): 020 7641 2176 (Out of hours: 020 7641 6000); adultsocialcare@westminster.gov.uk

Last updated 19/10/2022 by Laura Bruce and Sara Bram

- **To find safeguarding services for adults in other local councils: Search** 'Safeguarding adults' + the name of the council

Further information and advice:
- https://learning.nspcc.org.uk/safeguarding-child-protection/social-media-and-online-safety
- https://www.saferinternet.org.uk/
- https://www.net-aware.org.uk/
- https://www.childline.org.uk/

Last updated 19/10/2022 by Laura Bruce and Sara Bram

1. **SAFEGUARDING CODE OF CONDUCT FOR STAFF, VOLUNTEERS AND INDUSTRY PARTNERS**

Purpose
This Code of Conduct outlines the conduct the Sutton Trust expects from all staff and volunteers. This includes student ambassadors, university staff members and corporate partners undertaking duties for the organisation both in person and online.

In your role at the Sutton Trust you are acting in a position of authority and have a duty of care towards the young people we work with. You are likely to be seen as a role model and are expected to act appropriately.

Responsibilities
You are responsible for:

- following this code of conduct
- prioritising the welfare of young people at all times
- staying within the law at all times
- modelling good behaviour for young people to follow
- challenging unacceptable behaviour, discrimination and prejudice
- reporting all concerns about concerning and abusive behaviour to the Sutton Trust. *T*his includes behaviour being displayed by an adult or child and directed at anybody of any age.

Rights
You should:
- treat young people fairly and without prejudice, discrimination or favouritism
- understand that young people are individuals with individual needs and show patience
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the programme
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.
- Maintain professional boundaries at all times and not use programmes to develop personal or inappropriate relationships with participants

Relationships
You should:

- Promote relationships that are based on openness, honesty, trust and respect
- Avoid one-to-one interactions with participants, both in person and online. If these interactions are unavoidable, keep the interaction as professional and transparent as possible, for example:
    a) Remain in an open space, do not close doors to rooms or offices
    b) Let somebody else know about the situation, where you are and who with
    c) Politely reschedule the online call or meeting and/or join a wider group
- Ensure all contact with participants (including email correspondence and live sessions) is essential to the activity you are working on.
- Never agree to meet a participant outside of your professional capacity.

Last updated 19/10/2022 by Laura Bruce and Sara Bram

- Never give out your personal contact details, including during or after live sessions. Personal contact details include LinkedIn and personal email addresses. Do not 'friend' or 'follow' participants you are working with on social networking sites. See 4.B in this safeguarding policy for more detail.
- Never consume alcohol or drugs when responsible for running an activity or programme.
- Never lose sight of the fact that you are with children - behave appropriately and use appropriate language always and challenge inappropriate language used by participants.
- Not accept or give personal gifts to/from a participant.

Expectations of online behaviour
You should:
- Only use devices and email accounts that are authorised and official organisation social medial accounts.
- Only screen share appropriate materials essential for delivering the session. When screen sharing, close all other browser windows and online content, to avoid sharing inappropriate, irrelevant or sensitive information with students.
- Be punctual and dressed appropriately for sessions as you would if the sessions were face to face.
- Be aware of what can be seen in the background. Ideally, blur your background.
- Conduct sessions from a neutral space such as an office or living room if you can and avoid using a bedroom. Do balance this with privacy to ensure confidential conversations are not overheard
- Only record sessions if you have explicit consent to do so and for a specified purpose only. Young people should be made aware they can withdraw their consent at any time.

You must not:
- engage in behaviour that is in any way abusive including having any form of sexual contact with a child or young person
- record sessions using personal equipment
- use authorised equipment to access or distribute pornography. If personal equipment is used for accessing pornography that equipment must never be used in your work with young people and may raise concerns about your suitability to continue to work with young people.
- act in a way that can be perceived as threatening or intrusive
- patronise or belittle young people
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of young people.

Upholding this code of conduct
You should always follow this code of conduct and never rely on your reputation or that of the organisation to protect you. We will investigate any breaches of this Code of Conduct in line with our safeguarding procedures.

If you become aware of any breaches of this code, you must report them to your Sutton Trust contact.

2. PROCEDURES FOR PROGRAMME ACTIVITIES

All under-18 participants in our Sutton Trust programmes sign our standardised code of conduct, which can be found *here*.

2A. SITE VISITS

Last updated 19/10/2022 by Laura Bruce and Sara Bram

Where visits are made to programmes, visitors, such as donors, must:

- Be given and agree to adhere to a code of conduct prior to their visit
- Be chaperoned by a member of the Sutton Trust central staff team or delivery partner named contact
- Not be left in a one-to-one situation with a participant.

2B. PARTNER ORGANISATIONS

Partner organisations have responsibility for participants whilst they are in their care. Partners must agree to have implemented a safeguarding policy and procedures in line with best practice in the sector or to adopt the Trust's policy.

All formal or contractual arrangements with partners, individuals, groups or organisations which come into contact with children and vulnerable adults must include safeguarding responsibilities.

On programmes where we work in partnership with universities, the following procedures should be adhered to in case of a safeguarding concern:

- **Programmes delivered by universities as the primary partner** (such as UK Summer Schools): the university's own safeguarding policy should be followed, and the university would take primary responsibility for responding to the concern.
- **Programmes run jointly by the Sutton Trust and universities** (such as Pathways conferences): the Sutton Trust's policy should be followed, collaborating with the university on responding to the concern.

2C. WORK EXPERIENCE PLACEMENTS

Paragraph 333 of Keeping Children Safe in Education (2022) says:

"Schools and colleges are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience"

This is reiterated in a DfE advice document about post-16 work experience, published in March 2015. It explains on page 13 that, as of July 2012, work experience providers are no longer required to carry out enhanced DBS checks on staff supervising young people aged 16 to 17.

Providers of work experience placements will still be required to adopt the Trust's safeguarding policy or have developed their own policy of a similar standard.

Staff interacting directly with participants are required to adhere to the Trust's safeguarding code of conduct.

The Trust will provide the work experience partner with:

- A copy of our safeguarding policy
- A separate copy of our safeguarding code of conduct (for providers using their own safeguarding policy)
- Training slides summarising our Safeguarding policy

Last updated 19/10/2022 by Laura Bruce and Sara Bram

- Our handbook for work experience providers, including guidance on safeguarding and risk assessing work placements.

Incidents that occur on a work experience placement that is organised by the Trust should be reported to the Trust's DSO using the procedures outlined in section 5. Incidents that occur on a work experience placement organised by a partner organisation e.g. University, should be reported using the partner organisation's policies.

Students attending the placement will be given their university coordinator's contact information in case incidents arise. The Sutton Trust and partner organisations e.g. universities will liaise should incidents arise.

In accordance with our Safeguarding Code of Conduct, work experience placement providers must only use their work email and telephone to contact participants. No employee of any partner organisation should use their personal email address (e.g. Gmail, Yahoo).

The Trust and University Coordinator must be copied into all communication with the student.

If a placement provider wishes to enrol students on an additional programme or mentoring scheme, additional consent must be gained from the student by the placement provider. It must be made clear that it is a separate offer and not part of the Trust's programme e.g. a sign-up process. The employer would then be responsible for safeguarding and data protection.

2D. RESIDENTIAL PROGRAMMES AND EVENTS RUN BY THE TRUST

Where the Trust is responsible for delivering a residential programme for children or vulnerable adults the following activities will take place:

- All lead Sutton Trust staff to be externally safeguarding trained
- A lead safeguarding contact to be named for the programme
- Temporary staff e.g. student mentors will be recruited by universities and must attend interview and undergo an enhanced DBS check with Children's Barred List. References must be requested for any staff not previously worked with.
- Safeguarding training to be delivered to all staff working on the programme e.g. student mentors
- Risk assessment to be carried out, including safeguarding risks
- Participants to be notified of who to go to if there are problems
- Parental or carer consent sought for attendance, where appropriate
- Emergency contact details and medical needs to be collected in advance
- A log book taken to record concerns
- Emergency contact details shared with students and parents/guardians prior to event
- All volunteers or paid facilitators delivering or supporting sessions to sign our code of conduct
- Speakers and facilitators will be vetted to ensure their suitability, using our guidelines, including an assessment of their public online/social media presence and assessing their experience working with young people. The guidelines can be found here
- DSO to be on call to support with arising concerns.

Residential only:
- Codes of conducts to be signed by all participants and temporary staff members

Last updated 19/10/2022 by Laura Bruce and Sara Bram

- Health and safety and safeguarding information shared with parents and students prior to event
- Participants to be reminded of codes of conduct in welcome talks.

2E. ONLINE MENTORING

The Sutton Trust provides students with access to mentoring through online providers and platforms.

All mentoring platforms we use are moderated, with staff able to see all messages that are sent through the system. Key words and phrases are highlighted, and these messages are prevented from being sent until a member of staff has verified the content.

Safeguarding issues that arise through this platform will be managed by the service provider or delivery partner and reported to the Trust.

2F. SUTTON TRUST ALUMNI

The Sutton Trust invites participants to join the alumni community, and notably to sign up to the online alumni community at alumni.suttontrust.com (STA). When participants sign up they agree to a terms of use, accessible here: https://www.suttontrust.com/alumni/alumni-your-privacy/. The terms of use and information on reporting inappropriate content is also always available on the site, in a section titled 'Terms of Use'.

Whilst STA users are all 18 and over, we have measures in place to promote the safety and wellbeing of our alumni. These include:

- Activations on the platform are verified by Sutton Trust staff
- Alumni agree to a code of conduct when joining the platform
- Alumni are given Alumni team email address to contact with any concerns
- Content is reviewed by Sutton Trust staff, and any inappropriate content is flagged

If safeguarding concerns arise, these should be referred to the safeguarding team and we would work with alums to support them and signpost to relevant support services.

2G. ADULT TO CHILD RATIOS

We follow NSPCC's recommendation on best practice for adult to child ratios (https://learning.nspcc.org.uk/research-resources/briefings/recommended-adult-child-ratios-working-with-children#article-top):
- Having at least two adults present when working with or supervising children and young people.
- A ratio of one adult to ten children for 13 – 18 year-olds.

For our purposes adults can include volunteers, delivery partners, facilitators etc. – it does not need to be Sutton Trust staff.

Last updated 19/10/2022 by Laura Bruce and Sara Bram

The number of additional adults should also depend on the risk level, e.g. an online session may have a lower risk level and need fewer adults present, whereas a residential conference should have additional adults present to manage the higher level of risk.

3. ONLINE SAFEGUARDING POLICY

The purpose of these procedures is to describe how the Sutton Trust ensures safe digital delivery of its programmes. The Sutton Trust works with children and young people online in the delivery of its programmes. These include:

- Sutton Trust Online
- The Access Platform (TAP)
- Live sessions delivered by the Sutton Trust and partner organisations

Since the pandemic, Sutton Trust rapidly changed its methods of delivery to continue to work with children and young people safely. These procedures aim to promote safe working online. We acknowledge that our partner organisations will also have their own safeguarding procedures that they have a duty to follow.

3A. SUTTON TRUST ONLINE SAFEGUARDING ARRANGEMENTS

We will promote safe digital delivery of our programmes through:

- A **code of conduct for children and young people** which includes how to report safeguarding concerns about themselves or others, how inappropriate behaviour will be managed, signposting to support and advice
- A **code of conduct for staff** when working online
- **Guidelines for staff and partner organisations** for hosting online sessions, including delivery of live sessions via online platforms
- **Guidance for industry/corporate partners delivering work experience placements, including online work experience**
- **Moderation guidelines** for social and/or unsupervised contact between children and young people as part of a programme
- A **procedure for reporting concerns** or allegations and ensuring staff know how to respond - **see safeguarding policy and online safeguarding workflow**
- **Risk assessment** for use of technology and **risk assessment guidance** for corporate partners
- Named staff who have safeguarding responsibilities – **see safeguarding policy**

3B. USE OF TECHNOLOGY

In order to ensure the safe use of technology we will:

- regularly review and update the security of our information systems
- ensure online privacy in line with data protection law
- ensure that children and young people's user names, home addresses, logins, email accounts and passwords are used effectively and held securely
- ensure personal information about the children and young people who are involved with The Sutton Trust is held securely and shared only as appropriate
- examine and risk assess social media platforms and new technologies before they are used as part of our programmes

Last updated 19/10/2022 by Laura Bruce and Sara Bram

- update risk assessments when new features are released in platforms or apps or when the purpose for which they are being used with children and young people changes and communicate this information to the relevant staff.

3C. EDUCATION AND TRAINING

As we continue to develop the digital delivery of our programmes we will:
- provide induction, support and safeguarding training, including refresher training for relevant staff and volunteers, with the inclusion of child safeguarding online for relevant roles *(see also* https://learning.nspcc.org.uk/training/online-safety*)*
- provide guidance on using platforms safely with children and young people *(such as our 'Top tips' document for external stakeholders)*
- signpost children and parents/carers to sources of support, advice and information about online safeguarding and reporting concerns

3D. RECOGNISING CONCERNS

We understand that it can be difficult to recognise the signs of online abuse due to the nature of our contact with young people. However, we will be alert to the signs of online abuse and respond in accordance with the safeguarding and child protection policy and procedures.
We will take concerns relating to online safety seriously and always act to ensure the safety of children and young people as a priority.

3E. RESPONDING TO CONCERNS

We will use the relevant online safeguarding workflow to respond to concerns. Online safeguarding workflows can be found in the Safeguarding folder here. Staff, ambassadors and corporate partners will be expected to follow the reporting lines for any concern relating to the safety of young people online.

If online abuse occurs, we will respond to it by:
- having clear and robust safeguarding procedures in place for responding to abuse (including online abuse)
- providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, grooming, emotional abuse, sexting, sexual abuse and sexual exploitation (see Section 9 for definitions)
- making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

3F. SUTTON TRUST ONLINE

Sutton Trust online is a digital platform that students are invited to activate accounts for, it predominantly serves under 18s.

The safeguarding measures we specifically have in place for this platform include:

- Users given a unique ID link to create their accounts

Last updated 19/10/2022 by Laura Bruce and Sara Bram

- Terms of service shared with students and volunteers before they activate their accounts on the platform, these remain visible on the platform
- Training for Sutton Trust Alumni and student ambassadors on safeguarding before use of the platform
- DBS checks in place for Sutton Trust Alumni volunteers
- A moderation service for approving content before it is posted by volunteers
- A moderated messaging service, including messages being flagged and held for approval if concerning language is included
- A flagging service where students and volunteers can notify staff on any messages of concern
- All messages sent through the site are accessible to lead staff, who can intervene in conversations
- No peer-to-peer communication available
- Detailed safeguarding risk assessment and reporting procedure have been produced for this platform and shared with relevant partners

3G. ONLINE DELIVERY

The Sutton Trust has adapted to online delivery in light of the coronavirus pandemic, this includes running workshops and sessions through the Zoom platform.

The safeguarding measures we have specifically put in place for this work include:

- Require a password to attend the sessions
- Use the registration & waiting room functionality to make sure only registered and approved participants can attend a session
- Lock the session once it has started
- Remove unapproved participants if they do gain access
- Prevent students from screen sharing
- Disable video and mute all attendees at the start of the large-scale sessions (not group work or interactive sessions) and only turn on as required
- Disable private chat among attendees so students cannot direct message each other.
- Disable file transfer in the chat functionality
- Code of conduct/ expectations laid out to students reminding them to dress, act and behave appropriately
- Code of conduct/ expectations laid out to students reminding them to close all other browser windows/online content
- Prior to the session, remind students of dedicated email address and key contacts to raise any concerns and report any inappropriate content
- Sutton Trust staff member attends each session to monitor and manage risks/anything inappropriate

Last updated 19/10/2022 by Laura Bruce and Sara Bram

4. SOCIAL MEDIA AND MEDIA PROCEDURES

4A. PHOTOGRAPHY

Participants are asked at the point of application to a programme if they consent to their photographs being taken and used for marketing purposes. For participants who are under 18, consent for marketing must be given by their legal parent/ guardian.

Staff may not use personal devices to take photographs of participants who are under 18. There are Sutton Trust devices available for capturing photos at events. Photos taken on these devices may be posted on Sutton Trust social media accounts directly or emailed through a Sutton Trust email address to the Communications team for future posting.

Where a photographer is at an event, photography consent will be shared with the photographer and participants without consent identified. Participants will also be told that photography will be taking place and to speak to a member of staff if they have concerns.

If a participant asks for their photograph to be removed from any promotional material, the Trust will make arrangements for this to happen as quickly as possible.

4B. ONLINE AND SOCIAL MEDIA

The Sutton Trust has company accounts for social media including twitter, facebook, instagram and has a company website.

These accounts are monitored by a member of staff and any inappropriate or concerning comments are reported to the Director of Communications, Research and Advocacy and removed, where possible. If safeguarding concerns arise from these mediums, the reporting process in section 5 should be followed.

Sutton Trust staff are not to follow or engage with participants using their own personal social media accounts.

LinkedIn can be a powerful networking tool for young people to make connections. For this reason, staff may connect with alumni and participants aged over 18. Staff may not connect with current participants or alumni who are under 18 on LinkedIn.

If a participant wishes to connect with you for networking purposes, they should be directed to your work email address or central email address e.g. contact-us@suttontrust.com.

Do not use students' names or any details that would help to identify a student (for example which school they attend) on social media unless you have consent. If you do have consent to use a students' name, only use their first name.

Only use images of students in suitable clothing to reduce the risk of inappropriate use.

Last updated 19/10/2022 by Laura Bruce and Sara Bram

5. STAFF ROLES AND TRAINING

5A. SAFEGUARDING VULNERABLE GROUPS (BARRED LISTS)

The Disclosure and Barring scheme is designed to give greater protection to vulnerable groups. As a care provider, we are obliged to check that potential new workers who will be in contact with young people are not on the Barred List before allowing them to work for us. We are unable to employ anyone in a young person-facing role who is on this list.

All staff and volunteers whose work includes frequent, intensive or overnight contact with young people will need an enhanced DBS check with Children's Barred List, and this will need to be renewed every three years. This is defined as those providing teaching, training, instruction, guidance or advice on more than 3 days in a 30 day period or overnight with the opportunity for face-to-face contact with children.

For those who carry out regulated activity with children infrequently, but more than once, an Enhance level DBS certificate only is needed.

We also have a duty to refer any worker to the Disclosure and Barring Service where we suspect any case of abuse. The DSO or Deputy DSO will have responsibility for this. The Barred Lists are now managed by the Disclosure and Barring Service.

5B. TRAINING

All staff will be given this policy as part of their induction. Roles that work with young people directly i.e. Programmes team, will be required to attend safeguarding training. Internal safeguarding training will be held annually for all staff. Programmes staff will also be required to undertake Prevent training.

5C. THE ROLE OF THE DESIGNATED SAFEGUARDING OFFICERS

The role of the Designated Safeguarding Officers is to deal with all instances involving child protection and safeguarding that arise within the organisation. They will respond to all child protection concerns and enquiries, for reporting concerns to local authorities and updating policies and procedures annually.

Training will be provided, as appropriate, to ensure that staff are aware of these procedures. Specialist training will be provided for the DSO and any named deputies.

Should you have any suspicions or concerns relating to the DSOs, contact the CEO.

6. PROCEDURES FOR DEALING WITH DISCLOSURES AND REPORTING

6A. DEALING WITH DISCLOSURES OR CONCERNS ABOUT A CHILD OR YOUNG PERSON

If you have concerns about the welfare of a young person, you should report this to the DSO as soon as possible - see Appendix 9 for types of abuse and indicators.

Last updated 19/10/2022 by Laura Bruce and Sara Bram

In case of emergency or if a young person is in immediate danger, call the emergency services first and inform the DSO as soon as possible.

A young person may disclose to you directly i.e. share information with you, or you may see something that concerns you, for example in a message online. If this happens please follow the steps below.

1. **Remember the welfare of the young person is paramount**
   Ensure that the young person is safe in the immediate space.

2. **Listen carefully to the individual**
   Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the young person to 'shut down', retract or stop talking. Do not interrupt or ask leading questions.

3. **Let them know they've done the right thing**
   Reassurance can make a big impact to the young person who may have been keeping the abuse secret.

4. **Explain what you'll do next.**
   If age appropriate, explain to the young person you'll need to report the abuse to someone who will be able to help. **You must make sure you do not promise to keep it a secret**, you have a responsibility to report any abuse.

6B. REPORTING A DISCLOSURE

1. **Don't delay reporting the abuse** Report to the DSO as soon as possible so details are fresh in your mind and action can be taken quickly. You do not have to be sure that abuse has taken place to report something, and it is not your role to investigate whether abuse has taken place. Do not approach the person who may be the abuser.

2. **Make a written account as soon as possible**
   Where possible, use The Trust's safeguarding and incident report form, saved on the shared drive: Programmes, Policies and Procedures, Safeguarding folder (also copied below). If you do not have access to the form, please make a written account and write this up into the safeguarding incident form as soon as possible. Write down date, time, location and a description of the conversation. Keep it factual e.g. not 'the student seemed upset'.

3. **Your DSO will advise on next steps**

4. **Keep the disclosure confidential**
   Dealing with disclosures can be challenging and you may wish to talk about your experience. Your DSO will support you with this. Please do not disclose the information to others who do not need to know so that we can protect the confidentiality of the young person. Please see the Key Contacts section of this policy for contact information for authorities should you need extra support.

6C. REPORTING DIAGRAM
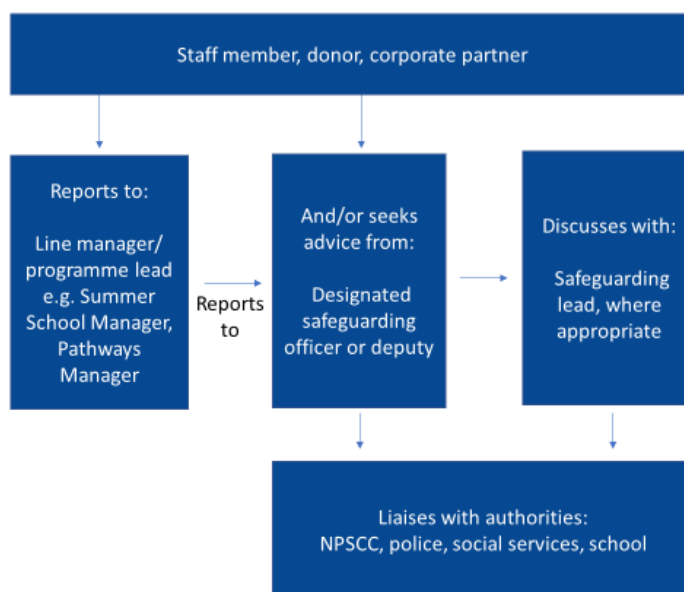
6D. REPORTING WELFARE CONCERNS

If you have concerns about a young person's welfare or behaviour, but they have not made a direct disclosure you should still report this to the Designated Safeguarding Officer and make a written record, where appropriate.

6E.REPORTING FEMALE GENITAL MUTILATION

If you are worried that a young person may be at risk of FGM you can make an anonymous call to the NSPCCs free 24-hour FGM helpline on 0800 028 3550 or email fgmhelp@nspcc.org.uk. Concerns should also be reported to your DSO.

6F. REPORTING RADICALISATION

If you think a young person is in danger call the police on 999 or call NSPCC on 0808 800 500 straight away. Concerns should also be reported to your DSO.

6G. REPORTING HISTORIC ABUSE

If you have concerns related to non-recent (historic) abuse on a Sutton Trust programme, this should still be reported. In this case, this will be treated with the same seriousness as recent abuse and our safeguarding procedures will be followed.

6H. CONFIDENTIALITY

As detailed in the reporting a disclosure section, it is important that you keep any disclosures that a young person makes confidential.

Any concerns that you report will also be held confidentially and only shared with staff or authorities that need to know the information.

Last updated 19/10/2022 by Laura Bruce and Sara Bram

6I. DATA PROTECTION

Where personal data is required to be processed in conjunction with safeguarding action according to this policy, the processing activity must be undertaken in accordance with our data protection policy. In particular, there must be a suitable lawful basis agreed prior to the safeguarding action. This may include but is not limited to:

a. Where an individual's life may be at risk, we may process the data according to the UK GDPR Article 6(d) where such processing is vital to the individual's life
b. Where an individuals or child is at risk – UK GDPR Article 6(f), Article 9(b), DPA 2018Schedule 1, Part 2 paragraph 18
c. The prevention or detection of crime – DPA 2018 Schedule 1, Part 2 paragraph 10 - where the processing is substantially in the public interest and there is an Appropriate Policy Document in place.

Records of such processing must be kept to account for the action taken. The principles of the UK GDPR must be observed at all times.

Where the lawful basis is either b or c above, some of the data subject rights may not apply. These include but are not limited to, the right to be informed, the right of erasure and the right of access. As indicated in section 6I of this document, consent is unlikely to be required and may prejudice the outcome of some safeguarding actions. The Appropriate Policy Document is available on request.

6J. INFORMATION SHARING

Data protection is not a barrier to sharing concerns about a young person. Always be open and honest about what you will do with the information. You should try to gain consent from a young person to share their information but do not let "no consent" prevent you from sharing. In the instances of not gaining consent, the decision to share should be noted in the safeguarding report. If you have any concerns about information sharing, contact the NSPCC helpline for advice.

For guidance on information sharing, see:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf.

6K. RECORD KEEPING

Scanned copies of safeguarding and incident report forms will be saved on the shared drive in a locked folder, accessible to DSOs and CEO. These will be retained for 7 years, after which details will be redacted to show student in question and outcome of the incident.

7. SAFEGUARDING AND INCIDENT REPORT FORM

The below form can be accessed through the shared drive and is saved in Programmes, Policies and Templates, Safeguarding folder.

You should complete this form and refer to the DSO.

Date of disclosure	
Time (as close as possible)	
Student/person concerned	
Programme, year and delivery partner concerned	
Student School	
Disclosure method	
Reported by	
Reported to	

Description of disclosure
Immediate response/ actions taken
Summary of steps taken and outcomes
Date resolved
Staff signed off by

Last updated 19/10/2022 by Laura Bruce and Sara Bram

8. PROCEDURES FOR MANANGING ALLEGATIONS AGAINST STAFF

The Sutton Trust will take seriously and investigate allegations that are made against staff or volunteers. An allegation may relate to a member of staff or volunteer who works for the Trust or visits our programmes who has:

- Behaved in a way that has harmed a young person, or may have harmed a young person;
- Possibly committed a criminal offence against or related to a young person; or
- Behaved towards a participant in a way that indicates they may pose a risk of harm to children or young people.

All actions, decisions and outcomes will be recorded along with the rationale for decision making, e.g. "After consultation with the local authority, we were advised to"…etc.

Reporting an allegation

All staff members have a responsibility to protect participants from harm and should report any allegations as soon as possible.
Allegations should be reported to the senior lead for safeguarding, or where the senior lead is the subject of an allegation, the chair of the board. This is so that any relevant disciplinary action can be effectively carried out.

Please see the organisation's whistleblowing policy in the Staff Handbook for further details on reporting an allegation when the above options are not available. In addition, the NSPCC's Whistleblowing Advice Line can be contacted on 08000280285 or help@nspcc.org.uk.

Managing the allegation

The senior lead for safeguarding should contact the local authority safeguarding contact and/or police to discuss the case as soon as possible.

The allegation will be considered against three strands:

a) If a police investigation is needed for a possible criminal offence
b) Notifying children's social care to protect the child
c) The Trust's own disciplinary action in respect of the individual.

Determining outcomes

The senior safeguarding lead will work with relevant authorities to determine an outcome of the allegation. These will be:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Supporting the young person

Last updated 19/10/2022 by Laura Bruce and Sara Bram

In cases where a young person may have suffered significant harm, or there may be a criminal prosecution, children's social care services or the police will be notified.

Supporting Employees

- The allegation will be dealt with as quickly as possible, with consideration for a fair and consistent approach that provides effective protection for the young person and the person subject to the allegation.
- Suspension of the person subject to the allegation may be required. All options to avoid suspension will be considered prior to taking this step.
- If an employee is suspended, the Trust will provide a named contact who will liaise with the employee during this period.

Supporting parents

- Parents or carers should be made aware of any allegations, unless this increases risk to the young person.
- Parents and carers should be kept informed about progress and told about the outcome of the investigation, including disciplinary action.

9. TYPES OF ABUSE AND INDICATORS

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Abuse can take a number of forms, which are not mutually exclusive. It can include direct ill-treatment or the impairment of health or development through neglect. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. For the purposes of making children the subject of a child protection plan, there are four categories of abuse:
- physical
- sexual
- neglect
- emotional.

Working Together to Safeguard Children (2015) states that LSCBs, local authorities and their partners should also be commissioning and providing services for young people at risk of:
- child sexual exploitation
- female genital mutilation
- radicalisation.

These are defined below, along with some of the main indicators.

Any degree of abuse is a matter for concern. Local authorities and agencies are charged with identifying and helping all children or vulnerable people about whom there are any concerns. Trained professionals assess concerns according to agreed frameworks and procedures.

Staff should seek advice on and/or report any suspected or alleged abuse, even if it appears insignificant. There may be other undisclosed aspects of abuse which, when considered together, may add up to a more serious concern.

Last updated 19/10/2022 by Laura Bruce and Sara Bram

Recognising child abuse is not easy, and it is not the responsibility of the Sutton Trust employees to decide whether or not child abuse has taken place or if a child is has been harmed or is at risk of harm. They do, however, have a responsibility to act if they have a concern about a child's welfare or safety.

9A. PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or career feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after.

Some indicators of physical abuse include:

- Bruising on uncommon sites
- Grasp marks on limbs
- Finger marks on face
- Bite marks
- Burns and scalds
- Scars (lots of them at different ages)
- Fractures.

9B. SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery or oral sex) or non-penetrative acts. They may include noncontact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways.

Some indicators of sexual abuse include:

- Sexually transmitted diseases
- Recurrent urinary infections
- Bruising in the genital region
- Inappropriately sexually explicit behaviour for age
- Unusual sexual knowledge for age
- Social withdrawal
- Sexually abusive behaviour towards other children.

9C. CHILD SEXUAL EXPLOITATION

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. CSE can happen in person or online. Some young people may be "groomed": tricked into believing they are in a consensual relationship. They might be given gifts or drugs and alcohol or be groomed online.

Some young people are trafficked for the purpose of sexual exploitation.

Last updated 19/10/2022 by Laura Bruce and Sara Bram

It is important to know that CSE can also occur through the use of technology e.g. young people being persuaded to send or post sexual images of themselves, film or stream sexual activities, or have sexual conversations. Once an abuser has images, video or copies of conversations, they might use threats and blackmail to force a young person to take part in other sexual activity. They may also share the images and videos with others or circulate them online.

Gangs use sexual exploitation:
- to exert power and control
- for initiation
- to use sexual violence as a weapon.

Children or young people might be invited to parties or gatherings with others their own age or adults and given drugs and alcohol. They may be assaulted and sexually abused by one person or multiple perpetrators. The sexual assaults and abuse can be violent, humiliating and degrading. https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/

Some indicators of CSE include:
- bruising consistent with physical or sexual assault
- young person being contacted or picked up by unknown adults
- young person spending time in inappropriate places
- absences e.g. leaving activities, missing school
- low self-esteem/self worth
- young person returning looking well cared for, despite no known base
- estranged from family
- acquisition or money or possessions without explanation.

9D. NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter or clothing; failing to protect a child from physical harm or danger; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some indicators of neglect include:
- Children not receiving adequate food
- Exposed to injury through lack of supervision
- Exposed to inadequate/dirty/cold environment
- "Home alone"
- Parents failing to get appropriate treatment for child

9E. EMOTIONAL ABUSE

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger,

or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Some indicators of emotional abuse include:
- abnormally passive, lethargic or attention seeking behaviour
- specific habit disorders, e.g. soiling, eating inedible substances, self-mutilation
- seriously delayed social development
- nervous behaviour
- weight and height disproportionate to age

9F. FEMALE GENITAL MUTILATION

Female genital mutilation (FGM) is also known as female circumcision or female genital cutting, and in practicing communities is known as "tahor" or "sunna". It is a form of child abuse which can have devastating physical and psychological consequences for girls and women.

Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. In 2003, the FGM Act tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.

Some indicators include:

- Coming from a community that is known to practice FGM
- Having a mother, sister or member of the extended family who has been subjected to FGM
- A child being taken back to her family' country of origin at the beginning of the summer holiday. This allows time for her to heal from the procedure
- Asking to be excused from PE, swimming classes or spending long periods of time in the bathroom

9G. RADICALISATION

Radicalisation is a non-specific word and may mean different things to different people. In the government published Prevent Duty guidance, radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. It is important to note that terrorist groups are not linked to certain religions e.g. a right-wing ideology is considered radicalisation

Some indicators and influencing factors include:
- Influence from peers, or charismatic individuals or material, including the internet that can incite animosity and violence
- Exposure to counter-political movements, ideologies and unorthodox beliefs
- Beginning to explore ideas and issues around their identity
- Rejection by peer, faith or social group or family
- Living in a community where there is social exclusion
- Experience of poverty/ill treatment of their faith/ethnic group in society
- Dissatisfaction with government foreign policy, international disputes, political views etc
- Exposure to gangs, social/criminal networks (including online), risk institutions/places

9H. ONLINE ABUSE

Online abuse[1] is any type of abuse that happens on the internet, facilitated through technology such as computers, tablets, mobile phones and other internet-enabled devices.

It can happen anywhere online that allows digital communication, such as: social networks, text messages and messaging apps, email and private messaging, online chats, live streaming, gaming and voice chat.

Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming, or the abuse might only happen online.

Children and young people can be revictimised (experience further abuse) when abusive content is recorded, uploaded or shared by others online. This can happen if the original abuse happened online or offline.

A child or young person experiencing abuse online might:
- spend a lot more or a lot less time than usual online, texting, gaming or using social media
- seem distant, upset or angry after using the internet or texting
- be secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

Children and young people may experience one or more types of abuse online which include:
- **cyberbullying** based on their characteristics such as age, gender, sexuality, ethnicity, sexuality, disability
- **sexting or sharing nudes** – where there is pressure or coercion to create and share sexual images/nudes which can be used as digital collateral to further exploit someone
- **sexual abuse** – where children and young people can be groomed online for sexual abuse which may then occur online or in person or both.
- **criminal exploitation** whereby perpetrators may use online platforms to build a trusting relationship with a child to involve them in criminal exploitation such as county lines to move drugs or money around the country or to radicalise them.

9I. CYBERBULLYING, OR ONLINE BULLYING

Cyberbullying can include:
- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- shaming someone online
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll

---

[1] Department for Education, 2018; Department of Health, 2017; Scottish Government, 2014; Welsh Assembly Government, 2018

Last updated 19/10/2022 by Laura Bruce and Sara Bram

- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- sending explicit messages, also known as sexting
- pressuring children into sending sexual images or engaging in sexual conversations.

For more information see:
https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/

9J. GROOMING

Grooming is when someone builds a relationship with a child so they can sexually abuse, exploit or traffic them. Children and young people can be groomed online or face-to-face by a stranger or by someone they know.
https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming/

Last updated 19/10/2022 by Laura Bruce and Sara Bram