



**skills for security**  
tomorrow's engineers *today*

## Safeguarding Policy & Procedure

| Reviewed By | Revision | Date       |
|-------------|----------|------------|
| David Scott | 1        | 01/08/2019 |
| David Scott | 2        | 01/12/2019 |
| David Scott | 3        | 01/03/2020 |
| David Scott | 4        | 01/06/2020 |
| David Scott | 5        | 01/08/2020 |
| David Scott | 6        | 01/12/2020 |
| David Scott | 7        | 01/03/2021 |
| David Scott | 8        | 01/05/2021 |
| David Scott | 9        | 01/08/2021 |
| David Scott | 10       | 01/09/2021 |
| David Scott | 11       | 01/09/2022 |
| David Scott | 12       | 01/06/2023 |

## Introduction

Skills for Security recognises its responsibility to safeguard and promote the welfare of learners within the legal framework of the Children Acts 1989 and 2004, staff are also made aware of the following publication:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education>

Under the terms of the Children Act 2004 anyone under the age of 18 is considered to be a child/young person. We are aware that many children and young people are the victims of different kinds of abuse and that they can be subjected to social factors that have an adverse impact upon their lives – including domestic violence, substance misuse, bullying, child prostitution and ritualistic abuse. We aim to create a safe environment within which all learners, irrespective of age, can thrive and adults can work with the security of clear guidance.

Skills for Security completes Enhanced DBS checks of all staff who come into contact with learners. As they are in a position of trust they have been made aware that they have a duty of care for all learners.

These guidelines are for the use of all paid staff, contractors, volunteers and visitors. We will also make them available to the learners' employers. Through this policy we will endeavour to ensure that:

- Learners are listened to, valued and respected
- Staff are aware of the need to be alert to the signs of abuse and know what to do with their concerns
- All paid and unpaid staff are subject to rigorous recruitment procedures
- All paid and unpaid staff are given appropriate support and training

All safeguarding concerns should be acted upon immediately. If you are concerned that a learner might be at risk or is actually suffering abuse, you should tell the Designated Safeguarding Lead immediately.

### Designated Safeguarding Officers

Designated Safeguarding Lead (DSL): Jon Ansty 01565 745036

Deputy Designated Safeguarding Lead: Leah Forsyth 01565 745036

Safeguarding email address: [safeguarding@skillsforsecurity.org.uk](mailto:safeguarding@skillsforsecurity.org.uk)

- The DSL takes lead responsibility for child protection and wider safeguarding.
- The DSL will be available for staff to discuss any safeguarding concerns.
- The contact details of the DSL and Deputy DSL can be found above.
- When the DSL is absent, the deputy/deputies will act as cover.
- If the DSL and deputy/deputies are not available, the Managing Director must arrange for appropriate cover. This may include the DSL or deputy/deputies being contactable by phone and the lead member of staff having access to this. Staff should speak to the lead member of staff and/or take advice if unable to speak to the DSL/DDSL.
- The DSL will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters:
  - Take part in strategy discussions
  - Contribute to the assessment of children; refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly;

- Keep the Managing Director informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Link with the local safeguarding partners and other external agencies as required. In relation to the Police, this will include consideration for 'When to call the Police'.
- Understanding the views of learners – Encourage a culture of listening/taking account their wishes and understanding the difficulties they may have in approaching staff about their issues
- The role of DSL and Deputy DSL is explicit in the role holder's job

These guidelines are divided into the following sections:

1. Recognising signs of abuse
2. What to do with your concerns
3. Allegations made against staff or another learner
4. Safe recruitment
5. Preventing radicalisation and extremism
6. Good practice
7. Safeguarding learners in Skills for Security
8. Checklist of welfare issues
9. County Lines
10. General points affecting safeguarding of under-18s

## **1. RECOGNISING SIGNS OF ABUSE**

It can often be difficult to recognise abuse. The signs listed in these guidelines are only indicators and many can have reasonable explanations. Learners may behave strangely or seem unhappy for many reasons, as they move through the stages of lives or their families experience changes. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further.

Someone can abuse a learner by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional or community setting, by telephone or on the Internet. Abuse can be carried out by someone known to a learner or by a complete stranger.

If you are worried about a learner it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

### **Physical Abuse**

Physical abuse can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, and suffocating. It can also result when a parent or carer deliberately causes the ill health of a learner in order to seek attention; this is called fabricated illness. Symptoms that indicate physical abuse include:

- Bruising in or around the mouth, on the back, buttocks or rectal area
- Finger mark bruising or grasp marks on the limbs or chest of a small child
- Bites
- Burn and scald marks; small round burns that could be caused by a cigarette
- Fractures to arms, legs or ribs in a small child
- Large numbers of scars of different sizes or ages

### **Emotional Abuse**

Emotional abuse happens when a learner's need for love, security, praise and recognition is not met. It usually co-exists with other forms of abuse. Emotionally abusive behaviour occurs if a parent, carer or authority figure is consistently hostile, rejecting, threatening or undermining. It can also result when

the learner is prevented from social contact with others, or if developmentally inappropriate expectations are imposed upon them. It may involve seeing or hearing the ill-treatment of someone else. Symptoms that indicate emotional abuse include:

- Excessively clingy or attention-seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness; a 'frozen watchfulness'
- Despondency
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

### **Neglect**

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, causing damage to their health and development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a child/person from harm or danger, or failing to access appropriate medical care and treatment when necessary. It can exist in isolation or in combination with other forms of abuse. Symptoms of physical and emotional neglect can include:

- Inadequate supervision; being left alone for long periods of time
- Lack of stimulation, social contact or education
- Inadequate nutrition, leading to ill-health
- Constant hunger; stealing or gorging food
- Failure to seek or to follow medical advice such that a child's life or development is endangered
- Inappropriate clothing for conditions

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a person to take part in sexual activities, whether or not the person is aware of what is happening. This may include physical contact, both penetrative and non-penetrative, or involve no contact, such as watching sexual activities or looking at pornographic material. Encouraging people to act in sexually inappropriate ways is also abusive. Under the Sexual Offences Act 2003, any sexual activity – contact or non-contact – with a child under the age of 13, is a crime. Symptoms of sexual abuse include:

- Allegations or disclosure
- Genital soreness, injuries or discomfort
- Sexually transmitted diseases; urinary infections
- Excessive preoccupation with sexual matters; inappropriately sexualized play, words or drawing
- A child/young person who is sexually provocative or seductive with adults
- Repeated sleep disturbances through nightmares and/or wetting

Older children and young people may additionally exhibit:

- Depression
- Drug and/or alcohol abuse
- Eating disorders; obsessive behaviours
- Self-mutilation; suicide attempts
- School/peer/relationship problems

Some members of our communities hold beliefs that may be common within particular cultures but which are against the law in England. Skills for Security does not condone practices that are illegal or harmful to children/young people. Examples of particular practices are:

- Forced Marriages

No faith supports the idea of forcing someone to marry without their consent. This should not be confused with arranged marriages between consenting adults.

- Under-age Marriages

In England, a young person cannot legally marry or have a sexual relationship until they are 16 years old or more

- Female Circumcision

This is against the law yet we know that for some in our communities it is considered a religious act and a cultural requirement. It is also illegal for someone to arrange for a child to go abroad with the intention of having her circumcised.

- Ritualistic Abuse

Some faiths believe that spirits and demons can possess people (including children). What should never be condoned is the use of any physical violence to get rid of the possessing spirit. This is physical and emotional abuse and people can be prosecuted even if it was their intention to help the child.

## **2. WHAT TO DO WITH YOUR CONCERNS**

In the event that a learner makes an allegation or disclosure of abuse against an adult or another learner, it is important that you:

- Listen to them and/or closely observe their presentation and behaviour;
- Let them know that you take what they are saying seriously;
- Do not attempt to question or interview them yourself;
- Let them know that you will need to tell someone else in order to help them. Do not promise to keep what they tell you secret;
- Inform your Designated Safeguarding Lead as soon as possible;
- Make a written record of the incident or events.

Sometimes you may just feel concerned about a learner, but do not know whether to share your concerns or not. In this situation you should always raise your concerns with your Designated Safeguarding Lead, who will help you to decide what to do.

## **3. ALLEGATIONS MADE AGAINST STAFF, VOLUNTEERS OR ANOTHER LEARNER**

Organisations that work or come into contact with learners need to be aware of the possibility that allegations of abuse will be made against members of their staff or another learner. Allegations will usually be that some kind of abuse has taken place. They can be made by learners and they can be made by other concerned adults. Allegations can be made for a variety of reasons. Some of the most common are:

- Abuse has actually taken place;
- Something happens to a learner that reminds them of an event that happened in the past – the learner is unable to recognize that the situation and the people are different;
- Learners can misinterpret your language or your actions because they are reminded of something else;
- Some learners know how powerful an allegation can be; if they are angry with you about something they can make an allegation as a way of hitting out;
- An allegation can be a way of seeking attention.

All allegations should be brought to the notice of the Designated Safeguarding Lead immediately. In cases where the allegation is made against this person, the complainant should approach a more senior official or take the following action him or herself:

- Make sure that the learner in question is safe and away from the alleged abuser;

- Contact an alternative DSL;
- Irrespective of any investigation by social workers or the police, you should follow the appropriate disciplinary procedure; common practice is for the alleged abuser to be suspended from work until the outcome of any investigation is clear;
- Consider whether the person has access to learners anywhere else and whether those organisations or groups need to be informed;
- Act upon the decisions made in any strategy meeting.

All incidents should be investigated internally after any external investigation has finished, reviewing organisational practice and putting in place any additional measures to prevent a similar thing happening again.

Well-functioning organisations encourage an environment where people feel safe to express their concerns about the practice of others. The term 'whistleblowing' is often used negatively; if a staff member, volunteer or visitor has concerns, they should not be victimized in any way for expressing them.

#### **4. SAFER RECRUITMENT**

The application of rigorous procedures for the recruitment of any staff who come into contact with learners, both directly and indirectly, can reduce the likelihood of allegations of abuse being made that are founded. As an absolute minimum, the following standards should be followed:

- All prospective workers (paid and unpaid) should submit a CV which shows details of their previous employment and for the names of two referees;
- All prospective workers (paid and unpaid) should be checked against the Barring list and have an enhanced Disclosure and Barring Service (DBS) disclosure before they start engagement with learners and anyone who refuses to do so should not be employed.
- Upon our discretion we will allow new staff to deliver before obtaining a DBS as long as they are shadowed by a member of staff with a DBS.
- All prospective workers (paid and unpaid) should be interviewed to establish previous experience of working in an environment where there is contact with learners and perceptions of acceptable behaviour
- Nobody should start work before references have been received. Referees should be reminded that references should not misrepresent the candidate or omit to say things that might be relevant to their employment;
- All appointments to work with learners should be subject to an agreed probationary period;
- New members of staff should be clear about their responsibilities and wherever possible, work to an agreed job description;
- These guidelines should be available to everyone and fully discussed as part of an induction process

A single central record of all checks made during recruitment need to be kept in one place; usually this is one spreadsheet. It should record that the following have been done or are N/A

- Identity – name, address, DoB, evidence of check made and date
- Start date
- Role in organisation
- Qualifications – required, evidence of check made and date
- DBS certificate – Disclosure number, evidence of check and date
- Barred list check
- Overseas Police check – check required (Y/N), evidence of check and date
- Right to work in UK – evidence of check and date

- All new staff should undergo on-line Level 1 Safeguarding training

All management staff within the business should regularly undergo Safer Recruitment training and refresher training.

## **5. PREVENTING RADICALISATION AND EXTREMISM**

Skills for Security are subject to a duty under Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. Whilst this is a standalone policy, it is integral to our safeguarding policy and should be applied as an extension to Skill’s current and established policies and procedures that cover this area.

If staff do become aware of or see signs of conflict, aggressive or extreme behaviour or opinions held by a learner or group of learners consult with the Designated Safeguarding lead and this is immediately referred to the Senior Management team to decide a course of action. Aim to talk to the learner (s) about acceptance and tolerance of a range of views, that people think differently and believe different things all of which is OK as long as it is reasonable and belief doesn’t extend to hurting/denigrating those with different beliefs.

Skills for Security takes safeguarding very seriously, therefore to ensure that we adhere to and achieve the Prevent duty we will;

- Provide appropriate training for staff as soon as possible. Part of this training will enable staff to identify learners who may be at risk of radicalisation
- We will build learner’s resilience to radicalisation by promoting fundamental British values and assist their personal, social and emotional development and understanding of the world
- We will ensure that our staff understand the risks so that they can respond in an appropriate and proportionate way
- We will be aware of the online risk of radicalisation through the use of social media and the internet
- As with managing other safeguarding risks, our staff will be alert to changes in learner’s behaviour which could indicate that they may be in need of help or protection
- We will not carry out unnecessary intrusion into a learner’s life but we will take action when we observe behaviour of concern.

## **6. GOOD PRACTICE**

Every organisation working with learners should have a Designated Safeguarding Lead who must undergo safeguarding training and be aware of all relevant statutory guidance. It is the responsibility of this person to make themselves available for consultation by staff, volunteers, visitors and learners. All staff, contract workers and volunteers are responsible for learners while on the premises and if delegated to supervise an organised activity outside the centre. Anybody who has contact with learners under 18 should be given information at induction, and ongoing training and updates (including the above) when required, on their responsibilities, institutional policies, procedures and expectations of professional conduct and ethical behaviour relating to under 18s. This information should be updated and communicated as and when policies change.

External visitors should complete the Visiting Speaker Form and make themselves familiar with the policy.

## **7. STAFF, VOLUNTEER AND CONTRACT STAFF MUST BE AWARE OF PROCEDURES FOR SAFEGUARDING UNDER-18s & VULNERABLE ADULTS**

Skills for Security is committed to safeguarding the welfare of learners under 18 and vulnerable adults who study with us.

We ensure that reasonable steps to promote and safeguard the welfare of young people and vulnerable adults are taken. In conjunction with the SMT, the Designated Safeguarding Lead is appointed the lead member of staff in relation to safeguarding issues and as the Under 18's point of contact.

### Attendance Policy

All learners are told at induction that they are expected to attend at least 90% of their course. They are advised that by attending all of their classes they will get maximum benefit from their time on course. If for any reason a learner misses a class we ask them to inform us by phone, email or text. Our contact details are given to the learner at induction.

Should a learner under aged 18 be absent from centre, the Operations Administrator will contact the learner directly to find out why they have not attended centre and ascertain whether they require any assistance. If contact cannot be made with the learner the Operations Administrator will inform their employer. If the learner had not maintained contact with the parents the police would be contacted and the parents of the learner would be kept updated.

## 8. CHECKLIST OF WELFARE ISSUES

| Signs to look out for                                     | Possible issue   | Tutor input  | Action to be taken  |
|---|--|--|---|
| Learners looking depressed and not participating in class | Learner feeling a little lonely and homesick           | Tutor to speak to learner and refer to Mental Health First Aider | Mental Health First Aider may suggest activities or/and introduce learner to other fellow learners of same age/location   |
| Learner attendance suddenly drops                         | Learner may be depressed or staying out late too often | Learner to pass on concerns to Mental Health First Aider         | Mental Health First Aider to investigate via homestay host and learner. For homesickness and depression see above examples. Otherwise explain clearly to learner that poor attendance has severe consequences on final results and will bring down their overall marks. |

### Learners with special needs

We ask learners/employers to fill in a questionnaire in order to assess our ability to accept such learners and in order to be able to make any plans or adjustments as needed to accommodate the learner in all areas of college life. (Please see Skills for Security Apprentice Enrolment Pack)

## 9. COUNTY LINES

County Lines exist throughout the UK. There are thought to be around 1,000 different County Lines operating across the country, each generating an estimated £800,000 a year in criminal profits, [Public Health England](#) report. It is against the law and a form of child abuse.

Data held by the police indicates that knife violence is endemic in County Lines drug dealing. The vast majority (85%) of police forces report the use of knives, and three-quarters (74%) report the use of firearms by County Lines gangs.

[The Children's Commissioner](#) estimated that 27,000 children in England identified as a gang member in 2019 but that number is undoubtedly conservative and has more than likely increased during the COVID pandemic. **More recent research by the National Youth Agency (NYA) found that:**



- 60,000 young people identify as a gang member.
- 300,000 young people know someone who is in a gang.
- 500,000 young people are in groups exposed to “risky behaviour” associated with gangs.
- 700,000 young people are persistently absent from education.
- 380,000 young people are homeless or at risk of homelessness.
- Post-COVID-19 gangs preyed on different demographics, such as young women, those with Special Educational Needs and Disabilities (SEND) and younger ages.

### **What are County Lines?**

County Lines is the name given to drug dealing where organised criminal groups use mobile phone lines and social media to move and supply drugs, usually from cities into smaller towns and rural areas. Gangs use the phones to receive orders and contact young people to instruct them where to deliver drugs. This may be to a local dealer or drug user, or a dealer or drug user in another county.

County Lines gangs are highly organised criminal networks that use sophisticated, frequently evolving techniques to groom young people and evade capture by the police. In the past decade the County Lines model has evolved with a broader range of products being offered to an expanding client base that is less reliant on addicts, targeting instead adult and adolescent “recreational” drug users.

### **The UK Government Home Office defines County Lines as:**

“A term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of ‘deal line’. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.”

### **What are the dangers of County Lines?**

Young people are at risk of dangers if they become caught in County Lines networks. Children and vulnerable people are used to transport drugs, cash or even weapons. It can involve intimidation, blackmail and serious violence. Sometimes gangs form a secure base in the home of a vulnerable person, forcing assistance through violence or exploiting a drug dependency.

### **More specifically, dangers include:**

- Physical injuries such as risk of serious violence and death.
- Emotional and psychological trauma.
- Sexual violence: sexual assault, rape, indecent images being taken and shared as part of initiation / revenge / punishment, internally inserting drugs.
- Debt bondage: the young person and families being “in debt” to the exploiters, which is used to control the young person.
- Neglect and basic needs not being met.
- Living in unclean, dangerous and/or unhygienic environments.
- Tiredness and sleep deprivation: the child is expected to carry out criminal activities over long periods and through the night.
- Exacerbating poor attendance and/or attainment at school / college / university.

County Lines has contributed to putting a large number of drugs and weapons on the streets. Fatal stabbings have increased due to County Lines, contributing to the highest levels since records began. The Home Secretary warned County Lines gangs are “devastating communities across the length and breadth of the UK”.

### **How to recognise County Lines**

Members of the public and those working in the service, retail or transport industries are in a position to spot signs of exploitation and abuse that accompany County Lines.

### **These signs aren’t obvious and can be a young person or child who is:**

- Travelling alone, particularly in school hours, late at night or frequently.
- Looking lost or in unfamiliar surroundings.

- Anxious, frightened, angry or displaying other behaviours that make you worried about them.
- In possession of more than one phone.
- Carrying lots of cash.
- Potentially under the influence of drugs or alcohol.
- Being instructed or controlled by another individual.
- Being seen in different cars/taxis driven by unknown adults.
- Being accompanied by individuals who are older than them.
- Being seen begging in a public space.

**Signs that someone’s property is being “cuckooed” by County Lines gangs include:**

- Suspicious items in the property, such as weighing scales, multiple phones, sim cards or drug paraphernalia.
- Unexplained presence of cash, clothes, and other items of value.
- Doors and windows which have been blocked off.
- New faces appearing at the property and the property regularly changing residents.
- Presence of unknown people in the property, who may act as friends of the inhabitant; their accents may indicate that they are not local and may have travelled to traffic drugs.
- More people than normal entering the property, or people arriving and leaving at unusual times.
- Cars arriving at the property for short periods of time.
- Concerns that the inhabitant of the property has not been seen for a while; they may feel too afraid to leave the house or may have been prevented from doing so by the drug gang.

**Who is vulnerable to County Lines exploitation?**

Any child or young person may be at risk of criminal exploitation through County Lines, regardless of their family background or other circumstances. For some, their homes will be a place of safety and security; for others this will not be the case.

Whatever the child’s home circumstances, the risks from exploitation spread beyond risks to the child. Their families or siblings may also be threatened or be highly vulnerable to violence from the perpetrators of this criminal exploitation.

**The national picture on County Lines continues to develop but there are recorded cases of:**

- Children as young as 12 years old being exploited or moved by gangs to courier drugs out of their local area, although 15–16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection; however, a person of any ethnicity or nationality may be exploited.
- Class A drug users being targeted so that gangs can take over their homes; this is known as “cuckooing”.

Child criminal exploitation is common in County Lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18.

The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology, using social media to make initial contact with children and young people.

To reduce the risk to themselves the dealers will use people they think others will not suspect, so any young person including those on the periphery of drug use or drug taking, or otherwise coming into contact with drugs, is vulnerable. In some areas there are local “hubs” recruiting local children to distribute drugs.

Peer grooming is common in County Lines and can take place in schools, on social media and in contexts where children meet. Social media is used in multiple ways – to glamorise and normalise drug selling, gang involvement and criminality, and it is also used to sell and advertise the drugs.

Leaders or dealers can enter into relationships with vulnerable young females, which can also lead to sexual exploitation or domestic violence. Young people can have drugs or money stolen and become indebted, needing to continue to supply to pay the money back.

“Cuckooing” is a term that is often used in connection with County Lines. When a gang moves into an area, they need somewhere to base themselves. They will often take over a vulnerable person’s home, for example, through exploiting mental or physical health issues or through promising free drugs. The takeover can be to such an extent that the person is either kicked out of their own home or can only access specific parts of their home.

### **Warning signs and risk factors**

As with other forms of exploitation and abuse, there are things that we can look out for which might indicate that someone is involved in County Lines.

#### **These include:**

- Being frequently missing from home, placement or school and may often be found out of the home area or may often go missing without explanation.
- Suddenly having significant amounts of money, new phones or new clothing which is out of character.
- Carrying a number of mobile phones, receiving constant calls/text messages.
- Being linked to groups of young people / young adults who are older or controlling.
- Having unexplained injuries or starting to self-harm.
- Having poor attendance/achievement at school or showing an unexpected decline in their academic work.
- Being isolated from their normal peer group and/or becoming secretive about their actions.
- Becoming withdrawn or alternatively having unexplained outbursts which are out of character, for example increasingly stressed/anxious/angry.
- Having unexplained bus or train tickets.
- Using unusual terms such as “going country”, “trapping”, “trap line”.
- Not wanting to go to specific areas without explanation.
- Having keys / hotel cards for unknown places.
- An increase in anti-social behaviour.

#### **Children and young people with increased vulnerability and risk to County Lines include those:**

- Who have previous experience of being abused.
- Who have lived or are currently living in unstable home environments, for example where there is domestic abuse, parental substance misuse, parental mental ill health or criminal activity.
- Who are socially isolated.
- Who are in families where there are significant money issues, homelessness or where the family are frequently having to change accommodation.
- Who are already involved in, or on the edge of, gangs – this may be through direct involvement or involvement of siblings.
- Who are looked after, particularly those who are in residential care settings and those already placed outside of their home area.
- Who are classed as Not in Education, Employment or Training (NEET).
- Who are excluded from mainstream education and attending alternative provisions such as pupil referral units.

It is also worth bearing in mind the increased risks that these gangs pose over the school holidays when children have more free time.

### **Responding to County Lines**

Any practitioner working with a child who they believe may be at risk of County Lines exploitation should follow their local safeguarding procedures and share this information as advised. If you believe a person is in immediate risk of harm, you should contact the police.

Law enforcement collectively has been stepping up its response, working to identify and take effective action in areas of the country with the most significant problems. Tackling County Lines, and the supply gangs responsible for high levels of violence, exploitation and abuse of vulnerable adults and children, is a priority for UK law enforcement.

The cross-country nature of County Lines means that any appropriate response will involve the police, the National Crime Agency, a wide range of government departments, local government agencies, and voluntary and community sector organisations. The Ministry of Justice's guidance (which is detailed at the end of this article) is not statutory but provides best practice and clear referral pathways for frontline practitioners to follow nationally. The guidance emphasises that the government approach to youth justice involves promoting the safeguarding of children as the primary objective and seeing the child first and the offender second.

### **Preventing County Lines**

Police say new tactics have enabled them to drive the expansion of County Lines drug dealing into reverse and have vowed to eradicate it from the country's worst-affected areas. In many cases, the arrest of the line controller terminates the line and the risk associated with that line.

However, prevention is often more effective, and this can be helped by being aware of how gangs recruit their members and some of the stages and tactics of exploitation, in order to plan early interventions, particularly in schools and colleges who are often best placed to spot the signs.

**Target** – Targeting occurs when a young person has been identified as a potential recruit. The victims are “befriended” to help establish a rapport and often refer to experiencing a sense of belonging, acceptance, and power over other people.

**Experience** – The strategy for this stage is to create an appealing lifestyle to reel victims in. The relationships are cultivated through gift-giving, offering protection, fostering a sense of belonging, and in some cases “gifting” weapons.

**Hooked** – When young people are “hooked” they are made to feel like a member of the gang or group. They might be given responsibilities that may involve criminal exploitation and recruitment of others to join the gang.

**Trapped** – This stage is arguably the more precarious of recruitment strategies for County Lines as victims feel dependent on the gang for survival. This can include money offering, drug dependency, blackmail, or even physical violence such as stabbing, raping and torture.

**Prevention** can be helped by schools and colleges raising awareness with children and young people of County Lines and the associated dangers. They can do this by giving children and young people easy access to advice and support and letting them know that there is someone they can talk to about any issues or concerns that they may have, ideally before they get caught up in the spiral of exploitation. They can also engage parents and carers so that they are aware of the signs to look out for and know who they can approach for help and support if they recognise any of the warning signs.

### **Guidance and legislation around County Lines**

The wide range of criminal activity associated with County Lines means that police and prosecutors, on a case-by-case basis, can consider different legislation which fully reflects the criminal conduct and gives courts sufficient sentencing powers, not just prison sentences, but ancillary orders and asset seizure to disrupt future criminal enterprises.

#### **Legislation includes:**

- **The Modern Slavery Act 2015** – This contains the offence of holding someone in slavery, servitude or forced or compulsory labour. This offence includes forms of exploitation relevant to human trafficking

and allows consideration of the victim's personal circumstances, such as any mental or physical illness which may make the person more vulnerable than other persons. Consent is irrelevant.

- **The Policing and Crime Act 2009** – This contains provisions for injunctions to prevent gang-related violence and gang-related drug dealing activity to be sought against an individual.
- **The Serious Crime Act 2015** – This contains provisions that amend the statutory definition of what comprises a “gang”, as defined in section 34(5) of Part IV of the Policing and Crime Act 2009.
- **The Misuse of Drugs Act 1971** – This contains the principal offences relating to the misuse of controlled drugs and covers a range of offences including those dealing with possession, supply and production.
- **The Customs and Excise Act 1979** concerns the importation (and exportation) of a controlled drug.
- **The Prevention of Crime Act 1953** and the **Criminal Justice Act 1988** may be appropriate in connection with “County Lines” activity, as they provide for offences involving offensive weapons and items which have a blade or are sharply pointed.
- **The Firearms Act 1968** provides for a range of offences concerning firearms, shotguns and specific types of weapons, their component parts and ammunition.
- **County Lines activity** often involves offences against the person. Offences to be considered include common assault, those offences set out in the **Offences against the Person Act 1861**, and attempted murder.
- **The Sexual Offences Act 2003** – This contains principal offences relating to Violence against Women and Girls. Females who have entered into relationships with gang members are often controlled, coerced and subject to domestic abuse. Females may also be sexually assaulted or threatened with sexual assault and prostituted for sexual favours in payment for drugs. Females may also be used against their will to initiate younger males into gangs through sexual activity.
- **The Anti-social Behaviour, Crime and Policing Act 2014** introduced a range of powers to ensure that local agencies have the tools they need to respond to different forms of anti-social behaviour. For example, the police and local authority may use the closure power to close premises quickly which are being used, or likely to be used, to commit nuisance or disorder or crime, and the prosecution may apply for a Criminal Behaviour Order (CBO) after the offender has been convicted of a criminal offence.
- **The Digital Economy Act 2017** introduced the Drug Dealing Telecommunication Restriction Orders (DDTRO) Regulations. These enable the police and National Crime Agency to apply directly to the civil courts for a court order to compel mobile network operators to close down mobile phone lines and/or handsets used in drug dealing. The DDTRO powers were introduced to enable the closure of anonymous phone lines known to be used for dealing drugs.
  - **The Home Office / Ministry for Justice** issued County Lines guidance primarily aimed at frontlinestaff who work with children, young people and potentially vulnerable adults. This guidance is aimed at professionals working in education, health, housing, benefits, law enforcement (police) and related partner organisations, as well as carers and parents.

### **What support is available?**

If you have concerns about a child or young person involved in gangs or County Lines, it is so important to get help as soon as you can.

If a child or young person is in immediate danger, call the police on 999.

As a parent or carer, you can make a referral for your child to Children's Care Services; search your local council's website for their contact information.

## **10. GENERAL POINTS AFFECTING SAFEGUARDING OF LEARNERS**

### **INTERNET SAFETY**

The use of the internet has risen significantly increased within the last decade and with there being around a 200 million increase year on year in young adults using social media, this means there are unfortunately many opportunities for something to go wrong. Skills for Security takes responsibility for educating learners in how to stay safe online and to be aware of issues such as hacking and cyberbullying.

## FIRST AID

Regular checks are carried out to ensure that the learners and staff are not interfering with any fire-fighting equipment (e.g. propping doors open with fire extinguishers) or with fire exits.

The Senior Operations Manager is in charge of the first aid kits and is to ensure that there are adequate in number and that all staff know where they may be found (included in staff induction). Unless in use, all kits are to stay in their designated position so as to be always accessible. In case of an incident, the incident report form is completed in a timely manner.

## UNDER 18'S IN ACCOMMODATION & SAFEGUARDING NUMBER

The Operations Administrator will confirm with any learners under 18 their accommodation whilst visiting the training centre. The Operations Administrator will then provide details of this to the Training team. There is an Safeguarding number used for learners to contact whilst visiting the centre.

**Copy of hotel checklist - [Skills for Security hotel checklist.docx](#)**

## MENTAL HEALTH

Promoting and protecting mental health is important for individuals' health, social wellbeing and productivity. Mental health wellbeing is not only relevant to learners but also to staff, and everyone can contribute to improved mental health wellbeing at work.

Skills is committed to the protection and promotion of the mental health and wellbeing of all staff.

Skills shall continuously strive to improve the mental health environment and culture of the organisation by identifying, eliminating, or minimising all harmful processes, procedures and behaviours that may cause psychological harm or illness to its employees and learners.

Skills shall continuously strive, as far as is reasonably practicable, to promote mental health throughout the organisation by establishing and maintaining processes that enhance mental health and wellbeing.

For more details see the Mental Health & Wellbeing Policy.

## 11. WHISTELBLOWING

Whistleblowing is an important aspect of a safeguarded institution whereby staff, contractors, volunteers are encouraged to share genuine concerns about a colleague's behaviour in confidence, with either the Designated Safeguarding Lead, line manager, SMT or HR as appropriate.

Working with learners places staff and volunteers in positions of power. In order to retain this trust it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

There may be situations whereby staff or volunteers have genuine concerns about the conduct of a colleague towards a learner. All members of Skills for Security have the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, managers, volunteers, learners or others, which may be harmful to those in their care and will receive appropriate support when doing so.

In accordance with the Public Interest Disclosure Act 1998 Skills for Security will support and protect those staff and learners who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers.

### Principles

- Skills for Security makes clear that no staff member will be subject to victimisation or other detriment by reporting concerns which they believe to be true.
- Any issue reported will be taken seriously and investigated. This may involve interviews or an

investigation to establish the facts.

- Skills for Security prefers matters to be raised where suspicion first arises rather than waiting for or searching for proof.
- Concerns raised will be treated in a confidential manner and feedback will be given on any action taken.
- Employees should put their names to any allegation wherever possible.
- A complainant will need to demonstrate that there are reasonable grounds for the concern, and will be expected to co-operate with any investigation that takes place. If any meeting or interview is arranged, there is a right to be accompanied by workplace colleague.
- This procedure will be supported by management culture.

### **What does the Policy cover?**

This policy covers whistleblowing relating to alleged:

- Miscarriages of justice in the conduct of statutory or other processes
- Failure to comply with a statutory or legal obligation
- Potential maladministration, misconduct or malpractice
- Health and safety issues including risks to the public as well as risks to learners and members of staff
- Abuse of authority
- Unauthorised use of public or other funds
- Fraud or corruption
- Breaches of financial regulations or policies
- Mistreatment of any person
- Action that has caused or is likely to cause physical danger to and person or risk serious damage to school property
- Sexual, physical or emotional abuse of members of staff or learners
- Unfair discrimination or favouritism
- Racist incidents or acts, or racial harassment

### **Confidentiality**

Skills for Security will try and protect the identity of employees who raise a serious concern and do not want their identity to be disclosed. However, it should be recognised that in some instances, it may not be able to resolve the concern without revealing identity (for instance because a statement from an employee may be required as supporting evidence). In these circumstances the employee will be advised on how the investigation will proceed.

### **Checklist**

**What to do if you wish to raise a concern:**

| <b>PLEASE DO:</b>  | <b>PLEASE DO NOT</b>   |
|--|--|
| Raise the matter as soon as possible if you feel your concerns are warranted                     | Do nothing. Skills would prefer you to raise your concerns so that we can carry out a full and fair investigation                            |
| Report your concerns or suspicions who has the appropriate authority to deal with them           | Be afraid of raising your concerns. Skills has safeguards in place to protect staff that raise a concern.                                    |
| Be assured that we will take seriously concerns raised based on honest and reasonable suspicions | Try to investigate the matter yourself. This may complicate any later enquiries, particularly if a criminal investigation becomes necessary. |
| Familiarise yourself with the whistleblowing procedure   | Approach or accuse any individuals directly.   |
| Consider writing down the key points and details as to why you are concerned.                    | Tell your suspicions or concerns to anyone other than those with the proper authority.   |

**What to do if receive a concern:**

| PLEASE DO:  | PLEASE DO NOT   |
|---|---|
| Be fully responsive to staff concerns and seek appropriate guidance                                 | Ignore the concerns raised  |
| Respect principles of confidentiality when dealing with staff                                       | Approach or accuse any individuals directly   |
| Take detailed notes of the information; including all details in relation to the matter of concern. | Tell your suspicions or concerns to anyone other than those with the proper authority     |
| Evaluate the allegation objectively.  | Try and investigate the matter yourself.  |
| Report this to the Skills for Security SMT.   | Do nothing- staff should feel able to communicate their concerns freely and in confidence |
| Deal with the matter promptly and as a matter of priority   | Delay the speed of response   |

**Related Policies**

[Prevent, Extremism & Radicalisation Policy & Procedures](#)

[Mental Health & Wellbeing Policy](#)

[Safe Recruitment Policy & Procedures](#)

[Whistleblowing Policy](#)

[Internet Safety Desk Aid leaflet](#)

**Appendix 1**

Safeguarding flow chart

**Appendix 2**

Local Safeguarding arrangements; Local Authority Designated Officer (LADO) / Multi-Agency Safeguarding Hub (MASH)

**Review**

This policy will be reviewed annually by the Managing Director.

Signed:

Date: 01.06.2023

*David Scott*

Name:

David Scott

Position:

Managing Director



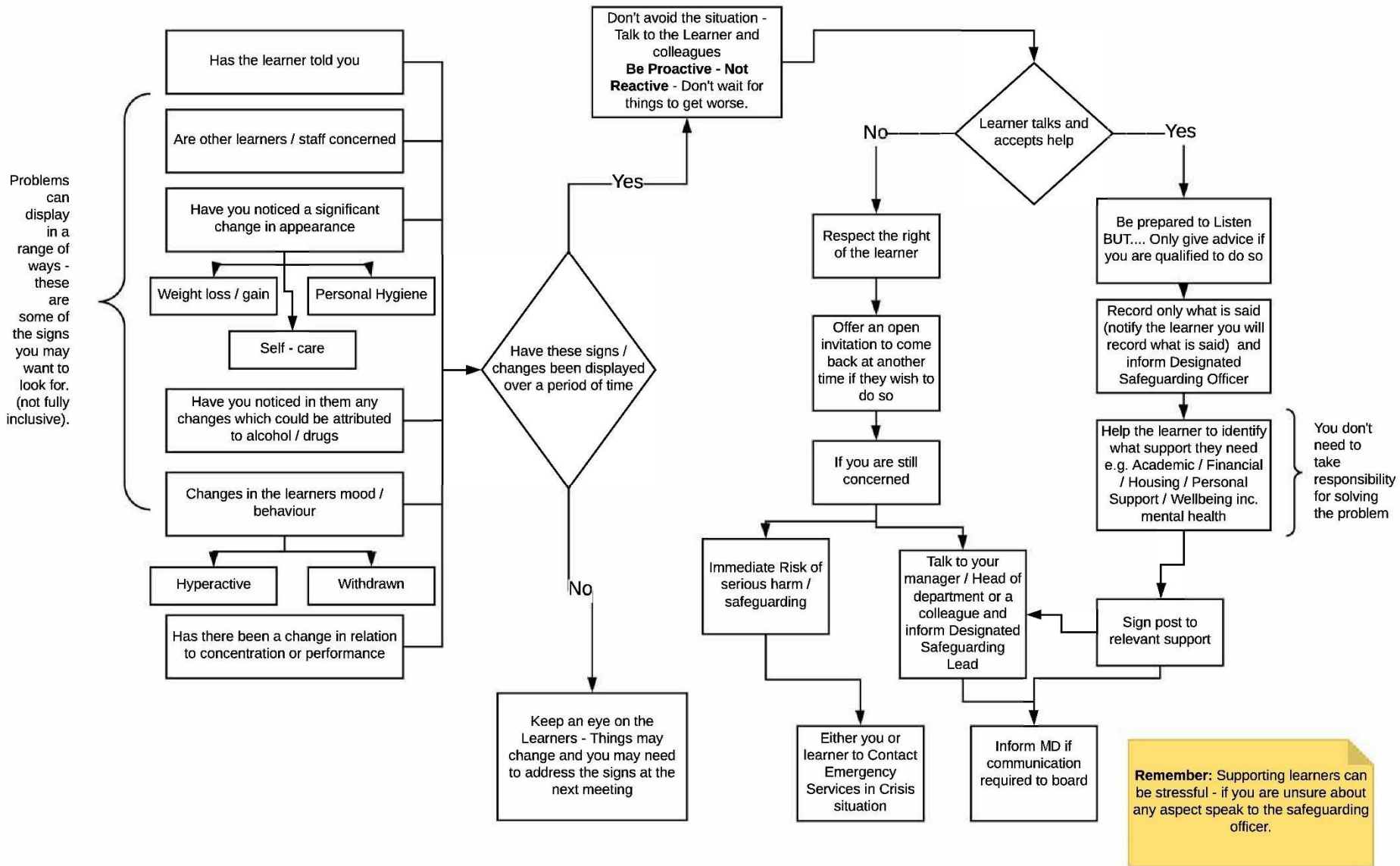
Appendix 1

How do you know that there may be a problem?



24 Hour Safeguarding Telephone Number:  
01565 745 036

Monitored Email Address:  
safeguarding@skillsforsecurity.org.uk



## Appendix 2

### [LEARNER LADO AND MASH LIST - Feb 2022](#)

Since Oct 22 DSL has an NHS App with LADO contacts for each authority.