	Policy: SA06 V.3	**European Union** European Social Fund
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	Title: Vulnerable Learners Protection and Anti Bullying Policy	

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Reviewed by	Dale Ball, Head of People & Designated Safeguarding Lead
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Authorised by Signature

Name Dale Ball
Role: Head of People and Designated Safeguarding Lead

1. Introduction

When you undertake training with PET-Xi Training Ltd we want to ensure that the time you spend with us is a happy time.

You are embarking on a training programme to improve your skill set. This could be in the form of obtaining units within the Qualification Credit Framework (QCF), an Apprenticeship, or a 2–3 week sector specific training course. All learners should be able to live free from fear or harm, and have their rights and choices respected. We are committed to looking after your safety and it is our responsibility to make sure you are kept safe during your time with us. PET-Xi Training Ltd has in place the Protection of Vulnerable Learners Policy to safeguard any vulnerable learner whilst in our care. We have an ongoing culture of vigilance and an open-door policy in looking into complaints.

We believe that by working with our learners we can develop an effective safeguarding environment in which everyone can successfully work together.

2. Who is a vulnerable learner?

Our definition of a vulnerable learner is person who requires extra support with their education. It is a broad term and includes:

Individuals who may be under 16 with:

- special educational needs and disabilities (SEND)
- those with either mental or physical health issues
- young people with behavioural difficulties such as obsessive-compulsive disorder (OCD) or emotional disturbance
- students who are in difficult circumstances which have led to them needing extra assistance.

Someone aged 16 or over who is, or may be:

- in need of community care (such as day, respite, or residential) services and
- unable to protect themselves from harm;
- someone caring for another person who may be vulnerable;

- vulnerable as a result of (but not limited to) age (adult if within a regulated activity), illness, learning or physical disability, sight or hearing impairments, a mental health condition, homelessness, domestic violence, or substance addiction.

We also recognise that we may need to categorise individuals as 'vulnerable' for either a short or long period of time. It is possible that a situation or series of events has led to someone requiring extra support for a few weeks or months and for others this support may need to be ongoing and/or permanent.

3. What to do if you believe someone may be experiencing abuse?

- immediately contact the PET-Xi Training Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) –if you suspect abuse or have any concerns. We treat all conversations sensitively. Keeping people safe is everybody's business. PET-Xi Training staff will never dismiss your concerns or make you feel uncomfortable in any way.

4. What do we mean by abuse?

Abuse is an action by another person that goes against someone's human or civil rights. It can take many forms: physical; mental; emotional; sexual, cyber, or financial.

Examples of bullying include:

Racist bullying: Bullying another person based on their ethnic background, religion or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986

Homophobic bullying: Bullying another person because of their actual or perceived sexual orientation.

Transphobic bullying: Bullying based on another person's gender 'variance' or for not conforming to dominant gender roles.

Sexist bullying: Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

Sexual bullying: Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension/dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

Prejudicial bullying: Bullying based on prejudices directed towards specific characteristics, e.g. SEND or mental health issues.

Relational bullying: Bullying that primarily constitutes of excluding, isolating and ostracising someone – usually through verbal and emotional bullying.

Abuse can happen anywhere: at home; at a learning centre; in the workplace; in a residential or nursing home; hospital; day centre; or in a public place. Some kinds of abuse are also a criminal offence.

5. How we protect vulnerable learners

PET-Xi Training follows strict rules, regulations, and policies. We implement many preventative measures, including ensuring that all PET-Xi employees go through our safer recruitment processes and are DBS checked and that all references are thoroughly checked before any offer of employment is made. PET-Xi Training ensures that 'E-Safety' measures are in place, and only acceptable use of our ICT equipment is carried out. This prevents any cyber bullying, for example, posting nasty messages on social websites, emails are monitored, and text messages are not causing any concerns or issues with our learners. All staff undertake all relevant training including Safeguarding and Prevent.

Bullying and harassment are not accepted in any manner. There is a code of professional conduct that all staff must adhere to. Included within it are: not requesting/accepting friend requests on sites such as Facebook, not sharing personal phone numbers, not meeting vulnerable people outside of business hours, not having relationships with apprentices etc. We also have a whistle-blowing policy which allows anyone to raise an issue with a senior member of staff.

If we are advised of or are aware of any abuse then we will take appropriate action to ensure the safety and well being of all vulnerable learners. We have a nominated Safeguarding team in place and their details can be found in the contacts section of this policy.

You can contact the nominated people directly. Whilst you are with us we would like you to:

- have Fun
- Enjoy your learning and **be safe**!

6. Anti-bullying policy including cyber bullying

6.1 Statement of Intent

PET-Xi Training is committed to providing a caring, friendly and safe environment for all of our learners so they can learn in a relaxed and secure atmosphere. Bullying of any kind is unacceptable on our programmes. If bullying does occur, all learners should be able to tell and know that incidents will be dealt with promptly and effectively. We are a *telling organisation* and believe in our 'Whistle blowing' Policy as a safeguard and protecting for learners. This means that *anyone* who knows that bullying is happening is expected to tell the staff.

6.2 What Is Bullying?

Bullying is the use of aggression with the intention of hurting another person. Bullying results in pain and distress to the victim.

Bullying can be:

- emotional   being unfriendly, excluding, tormenting (e.g. hiding books, threatening gestures);
- physical   pushing, kicking, hitting, punching or any use of violence;
- racist   racial taunts, graffiti, gestures;
- sexual   unwanted physical contact or sexually abusive comments;
- homophobic   because of, or focussing on the issue of sexuality;
- verbal   name-calling, sarcasm, spreading rumours, teasing;
- cyber   through areas of the internet ,such as email & internet chat room misuse; mobile phone threats by text messaging & calls; misuse of associated technology , e.g.. camera &video facilities.

6.3 Why is it Important to Respond to Bullying?

Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Learners who are bullying need to learn different ways of behaving.

We all have a responsibility to respond promptly and effectively to issues of bullying.

6.4 Policy summary

- all managers, teaching and non-teaching staff and learners should have an understanding of what bullying is;
- all managers, teaching and non-teaching staff and learners should know what PET-Xi Training's policy is on bullying, and follow it when bullying is reported;
- all learners should know PET-Xi's policy is on bullying, and what they should do if bullying arises;
- as a training provider we take bullying seriously- learners should be assured that they will be supported when bullying is reported;
- bullying will not be tolerated.

6.5 Signs and symptoms that someone may be being bullied.

A learner may indicate by the following that he or she is being bullied. Tutors/Assessors/Mentors should be aware of these possible signs and that they should immediately advise the Designated Safeguarding Team if a learner:

- is frightened of attending any training sessions on their own;
- doesn't want to go to the work placement/apprenticeship employment;
- asks to be taken of the programme but will not give a reason;
- changes their usual routine;

- becomes withdrawn anxious, or lacking in confidence;
- starts stammering;
- attempts or threatens suicide or runs away;
- feels ill in the morning;
- begins to do poorly in course work;
- has possessions which are damaged or " go missing";
- asks for money or starts stealing money (possibly to pay a bully);
- has unexplained cuts or bruises;
- becomes aggressive, disruptive or unreasonable;
- is bullying other learners;
- is frightened to say what's wrong;
- gives improbable excuses for any of the above;
- is afraid to use the internet or mobile phone;
- is nervous & 'jumpy 'when a cyber message is received.

These signs and aspects behaviours could indicate other problems, but bullying should be considered a possibility and should be investigated.

6.6 Procedures

- report bullying incidents to the safeguarding team;
- in all cases of bullying, the incidents will be recorded by the Safeguarding Team;
- if necessary and appropriate, police will be consulted;
- bullying is investigated and stopped quickly;
- an attempt will be made to help the bully (bullies) change their behaviour.

6.7 Outcomes

- The bully (bullies) may be asked to genuinely apologise. Other consequences may take place.
- In serious cases, suspension or even exclusion will be considered.
- If possible, the victim(s) and bully (ies) will be reconciled.
- after the incident(s) have been investigated and dealt with, each case will be monitored to ensure repeated bullying does not take place.

6.8 Prevention

We will use methods for helping learners to prevent bullying. As and when appropriate, these may include:

- writing a set of rules of conduct;
- signing a behaviour contract;
- reported or signs of bullying investigated;
- Diversity and respect for others is promoted;

- Staff think carefully around seating plans etc if any early signs are arising;
- Creating a safe place/space for learners to talk to staff if there are any issues;
- Raising any concerns or seeking advice from the Safeguarding Team;
- Having discussions about bullying and why it matters.

6.9 What is cyber bullying?

Cyber bullying is bullying through the use of communication technology like mobile phone text messages, e-mails or websites. This can take many forms for example:

- sending threatening or abusive text messages or emails, personally or anonymously;
- making insulting comments about someone on a website, social networking site   (e.g.: facebook) or online diary (blog);
- making or sharing derogatory or embarrassing videos of someone via mobile phone or email (such as 'Happy Slapping' videos).

It should be noted that the use of ICT to bully is against the law.

Abusive language or images, used to bully, harass or threaten another, whether spoken or written (through electronic means) may be libellous and may contravene the Harassment Act 1997 or the Telecommunications Act 1984.

If a bullying incident directed at a learner occurs using email or mobile phone technology either inside or outside of our programme time:

- Contact the Safeguarding team
- advise the learner not to respond to the message;
- secure and preserve any evidence;
- inform the sender's e-mail service provider;
- consider informing the police depending on the severity or repetitious nature of the alleged offence.

If malicious or threatening comments are posted on an Internet site about a learner or member of staff:

- inform and request the comments be removed if the site is administered externally;
- secure and preserve any evidence;
- endeavour to trace the origin and inform police as appropriate.

Learners should be confident when it comes to reporting inappropriate incidents involving the internet or mobile technology: they must be able to do this without fear.

PET-Xi recognises that in today's word, children and vulnerable adults need to be safeguarded from potentially harmful and inappropriate online material on the internet.

The breadth of issues can be categorised currently into four areas of risk as taken from Keeping Children Safe in Education 2023:

- Content - being exposed to illegal, inappropriate, or harmful content (pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism)

- Contact - being subject to harmful online interaction with other users (peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit)

- Conduct - online behaviour that increases the likelihood of, or causes, harm (making, sending and receiving explicit images)

- Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams

From the 1st September 2023 under KCSIE 2023, the DSL is responsible for ensuring adequate and appropriate online monitoring and filtering standards.

PET-Xi use a DFE approved online monitoring and filtering software that is installed on to all laptops/desk tops for learners and staff. This software will detect any harmful content that is searched, created or transferred and immediately notifies the DSL and IT Manager.

The software has five levels of severity for example level five including content relating; suicide, terrorism and matters of a sexual nature. If a level five severity is raised, the DSL will take immediate action.

Harmful content will be blocked by the IT Department whilst anyone is using PET-Xi devices in a PET-Xi building regardless of age.

The DSL and IT Manager will review the software every week to ensure its effectiveness and reviewing content.

All staff receive E-Safety training when they start with PET-Xi and are provided with a copy of the E-Safety policy to ensure they have understanding of the risks associated online for themselves, other employees and learners. This is in addition to the annual safeguarding training all staff receive. The DSL and IT Manager will provide updates throughout the year in relation to E-Safety.

In line with training and PET-Xi policies, if anyone becomes aware that a staff member or learner is trying to or has accessed harmful content, they must notify the Safeguarding Team immediately.

PET-Xi cannot control what staff, children and vulnerable adults access on their personal mobile phones. Therefore, PET-Xi have adopted the approach that mobile phones ae no permitted during a course/teaching.

PET-XI have Cyber Essentials accreditation and has measures in place to protect against a cyber-attack.

Please refer to the E-Safety policy for further information or contact the Safeguarding Team.

6.10 Support

- Following any complaint of bullying, staff will hold an informal discussion, to check whether the bullying has stopped;

- If necessary, group dynamics are broken up by members of staff by assigning places in classes;

- The victim is encouraged to tell a trusted person (staff member/Safeguarding) if bullying is repeated;

- The victim is encouraged to broaden their friendship groups;

- PET-Xi will work with the perpetrator regarding any underlying mental health or emotional wellbeing problems.

Risk Assessment Process for Vulnerable Adults

Considerations for Risk Assessment

The Focus is on the Vulnerable Adult & the Environment they are in

The main focus of any risk assessment should be the safety and protection of the vulnerable adult and the environment they are in. Take into account any events in the chronology of the vulnerable adult and/or the alleged perpetrator which are pertinent to the safeguarding issue. If a High level risk is identified, then immediate action must be taken. Risk assessments should be undertaken with the service user wherever possible. Every attempt should be made to clarify the individual's own wishes about his or her needs. All vulnerable adults should be treated with dignity.

The Right to Independence

The assessment of risk raises difficult questions of balance in professional practice. Adults have a right to live independent lives, and to take the risks they choose. This right must be weighed carefully against the likelihood of significant harm arising from the situation. Issues of capacity (see Mental Capacity (Amendment) Act 2019) must be fully considered in risk assessment. It should be remembered that people may have capacity to make decisions with respect to one area but may lack capacity to make decisions about other areas.

Involvement of others in risk assessment

A decision should be made as to whether an advocate should be involved in order to help the process. Other people who could be involved include carers, professionals, volunteers, family and friends. It should be made clear at the strategy meeting who will take the lead.
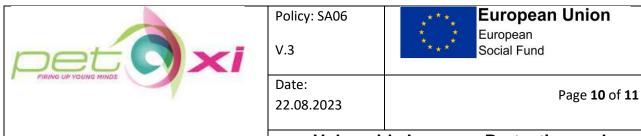
Recording of Risk Assessments

It is essential to record risk assessments accurately, detailing what decisions have been made about level of risk, by whom they have been made and on what basis. Risk assessments should be clear and use plain language.

Informed Consent

Service users must give their informed consent to obtain/share information. However, confidentiality should be broken when it is thought that it is possible a risk of harm could occur to the service user and they lack capacity to make an informed decision, or to another vulnerable person, member of the public (this would include workers) or to property.

Monitoring and review

Risk assessment is an ongoing process that becomes risk management. The risk assessment needs to be reviewed on a regular basis. It is necessary to set a date for review depending on the grading of risk. For example, if it is a high risk case, a review case conference should take place fairly soon after the initial case conference i.e. within a month

Contacts

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Deputy Safeguarding Officer	Clare Bates	cbates@pet-xi.co.uk	07551 154775

Related documents

- Safeguarding policy
- PREVENT policy
- Low Level Concerns Policy
- Keeping Child Safe In Education 2023

Policy Version Tracker

Version	Action	Author	Verifier	Comments	Date
1.1	Original	Simon Fitzgerald	Nasir Lakhanpal	Created	19/04/2017
1.2	Review	Simon Fitzgerald	Nasir Lakhanpal	Included update to informed consent	03/10/2017
1.3	Updated	Simon Fitzgerald	Nasir Lakhanpal	Incorporated ESF logo and update	23/10/2018
1.4	Original	Simon Fitzgerald	Nasir Lakhanpal	Reviewed no action	22/10/2019
2.0	Review	Simon Agar	Ruth Exelby	Updated legislation, changes to safeguarding team	19/03/2021
2.1	Updated	Bob Pinner	Susan O'Neill	Updated with changes to safeguarding team and including under 16 learners	25/10/2022
V3	Updated	Dale Ball	Susan O'Neill	Reviewed content	25/10/2023
				Next review	22/08/2024