



**Riverside
College**

Widnes & Runcorn

SAFEGUARDING VULNERABLE ADULTS POLICY 2018-2019

1.0 INTRODUCTION

- 1.1 The College fully recognises its duty toward safeguarding and promoting the welfare of vulnerable adults
- 1.2 The aim of this policy is to establish a “whole college” approach to safeguarding vulnerable adults, in order to:
 - Provide a safe learning environment
 - Identify vulnerable adults who are suffering or likely to suffer significant harm, and ensure appropriate action to preserve their safety both at home, at College and in the wider community where possible.
- 1.3 The College will prevent abuse and neglect by ensuring that the ethos and atmosphere of the college is conducive to a safe environment. Students will feel supported and able to report safeguarding concerns to any member of staff. Staff will feel they are supported by colleagues and the senior management team, including the governing body, and are able to report and seek advice and guidance on any safeguarding concerns, including those regarding colleagues or themselves.
- 1.4 Safeguarding will be reflected throughout the curriculum.
- 1.5 As part of our safeguarding ethos, the College encourages students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The College ensures that partisan political views are not promoted in the teaching of any subject in the college and where political issues are brought to the attention of the students, reasonably practicable steps will be taken to offer a balanced presentation of opposing views. Further information regarding this is contained in Section 15.
- 1.6 The College will protect vulnerable adults at risk of abuse and neglect by having safeguarding procedures in place that reflect current legislation, guidance and best practice.
- 1.7 The College also ensures that safer recruitment practices are followed when recruiting staff at all levels across the school, including volunteers. Induction and continuous staff training on safeguarding children relevant to role and responsibilities is also provided.

1.8 The College will make key decisions regarding information sharing in line with guidance and data protection and will always seek to gain parent's consent, but will always consider the principles of section 1 of the Children Act 1989 whereby the child's needs are paramount.

1.10 This policy has been developed in accordance with the principles established by:

- [Education Act 2002](#)
- [Children Act 1989](#)
- [Children Act 2004](#)
- [Safeguarding Vulnerable Groups Act 2006](#), as amended by the [Protection of Freedoms Act 2012](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Childcare Act 2006](#); [Childcare \(Disqualification\) Regulation 2009](#)
- [Children and Families Act 2014](#)
- [Children and Social Work Act 2017](#)
- [Data Protection Act 2018](#); [General Data Protection Regulation \(GDPR\) 2018](#)

and with reference to the following key documents and statutory guidance:

- [Keeping Children Safe in Education 2018](#)
- [Working Together to Safeguard Children 2018](#)
- [Disqualification under the Childcare Act 2006; effective 31st August 2018](#)
- [Prevent Duty Guidance 2015](#)
- [The Prevent Duty; Departmental advice for schools and childcare providers 2015](#)
- [Information sharing; Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2018](#)
- [UKCISS Sexting in Schools and Colleges; Responding to incidents and safeguarding young people](#)
- [Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation](#)
- [Teacher Standards 2012](#)
- [Halton Safeguarding Children Board Pan-Cheshire Multi-Agency Safeguarding Children Procedures \[www.proceduresonline.com/pancheshire/halton/index.html\]\(http://www.proceduresonline.com/pancheshire/halton/index.html\)](#)

1.11 This policy should be viewed alongside the following college policies which have relevance to safeguarding and promoting the welfare of children:

- Whistleblowing Policy
- Guidance for Safer Working Practices with Learners
- Safer Recruitment and Retention Policy
- Anti-Bullying Policy
- E-Communication Policy
- Admissions Policy
- Health and Safety Policy

2. SCOPE

2.1 Safeguarding is everybody's responsibility and, as such, this policy applies to all staff and volunteers working in the school. An allegation, disclosure or suspicion of abuse, or an

expression of concern about abuse, could be made to any member of staff, not just those with a teaching or welfare-related role. Similarly, any member of staff may observe or suspect an incident of abuse.

2.2 This policy applies to all staff (including paid staff and volunteers, permanent / temporary / ancillary / supply contracts), governors and students on placement.

2.3 This policy replaces the previous Safeguarding Vulnerable Adults Policy 2017/18 and is reviewed on an annual basis.

3. DEFINITION OF TERMS

3.1 **Adult**

“Adult” in this context means a person aged 18 years or over.

3.2 **Vulnerable Adult**

A “vulnerable adult” is any person age 18 or over who is or maybe in need of community care services by reason of mental / physical or learning disability/ age or illness and unable to take care of them self or unable to protect themselves against significant harm or serious exploitation.

They may include for example, people with:

- a mental health problem or mental disorder including dementia , or people on the autistic spectrum
- a physical disability
- a sensory impairment
- a learning disability
- who are frail and who are experiencing a temporary illness

3.3 **Community Care Services**

“Community Care Services” will be taken to include all care services provided in any setting or context.

3.4 **Adult abuse**

Abuse is when someone does or says something that hurts, upsets or frightens another person and that person is not able to stop it happening. It might happen on purpose or the person doing it might not realise it is wrong or causing harm, but both are still wrong and it should not happen. If you think something is wrong, talk to someone.

Abuse can be caused by anyone:

- A partner or relative
- A friend or neighbour. Sometimes a person can pretend to be a friend so they can abuse a person, this is called Mate Crime
- A carer, this can be someone who is paid or a volunteer

- Someone in a position of trust
- A stranger

There are different kinds of abuse:

Physical abuse is when someone physically hurts another person. It could include:

- hitting , slapping, kicking, shaking or pushing
- force feeding
- misusing medication
- throwing things at someone

Financial or material abuse is when someone takes something that belongs to someone else without asking or makes that person give them things. It is when someone does not let another person use their money how they want to use it. It can include:

- internet scamming
- fraud
- misuse of property, possessions or benefits
- pressure or control with financial affairs or wills

Neglect is when a person does not get the help they need and their medical, emotional or physical care needs are ignored. It could include:

- being left alone when the person doesn't want to be
- being left hungry or thirsty
- not getting help with medication
- not seeing a doctor when the person wants to
- not being helped with personal care or using the toilet
- failure to provide educational services

Sexual abuse is when someone is made to do sexual things that makes them feel sad, angry, frightened or they do not like or understand. It can include:

- unwanted touching
- rape
- sexual assault
- sexual acts that a person has not given consent to or was pressured into consenting
- pressure to look at sexual images
- when someone talks about sex to a person when they don't want them to
- being subject to sexual innuendo or harassment

Psychological or emotional abuse is when someone is made to feel sad, afraid or not important. It can happen anywhere including on the internet or phone. It can include:

- calling names, verbal abuse

- being made fun of, humiliated
- blaming a person for things that are not their fault
- ignoring or depriving
- threats or intimidation
- controlling
- cyber bullying

Discriminatory abuse is when someone is treated badly because they are seen as different to others; this is sometimes called Hate Crime and can include:

- racism
- sexism- sexuality or gender identity
- abuse related to the way someone talks, their religion or age
- acts based on a person's disability
- harassment

Modern Slavery is when someone is forced to work with little or no pay, or threatened with violence if they do not work. It can include:

- human trafficking
- forced labour
- domestic servitude

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners or family members regardless of gender or sexuality. It usually happens in a person's own home and it could include:

- psychological
- physical
- sexual
- financial abuse
- what is known as 'honour' based violence

Self-neglect is when someone might come to harm if they do not look after themselves. It covers a wide range of behaviours where a person fails to care for their own personal hygiene, physical or emotional health or surroundings and it could include:

- not getting enough food, water or heat
- not taking medication or getting medical care that is needed
- not accepting help or support that is necessary to stay safe
- not looking after personal hygiene
- unsafe, hazardous living condition
- hoarding

Organisational abuse is abuse caused by an organisation and is abuse or neglect of an adult by people in a setting or service where the adult is living or using; for example, a care home, hospital or service provided in a person's own home. It could include:

- neglect
- poor practice
- mistreatment of a regime

3.5 Extremism

Extremism is defined in the Counter Extremism Strategy 2015 as “the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.” Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

4.0 ACCOUNTABILITY

4.1 All staff, volunteers and governors working in the school, are responsible for the operation of this policy.

4.2 The Designated Safeguarding Lead for the College is Thalia Bell, Deputy Principal.

In her absence, the Deputy Designated Safeguarding Lead is Paula Mitchell, Programme Manager, Kingsway.

Safeguarding Officers are:

- Anna Hopwood – Kingsway
- Vicky Jones – Kingsway
- Keith Barker – Kingsway
- Helen Maddison – Cronton
- Jayne Barker – Cronton
- Mehrdad Daliri – Cronton
- Sandra Snooks – Cronton
- Fiona Gray – Cronton

4.3 All members of staff have a legal duty to report any disclosure, allegation or suspicion of abuse, to the Designated Safeguarding Lead or, in their absence, their Deputy. This must be done *immediately* following the disclosure or suspicion is made or arises. A Cause for Concern form (Appendix 1) should also be completed, which is then held by the Designated Safeguarding Lead and will be placed in the student's confidential individual file.

4.4 The Designated Safeguarding Lead or a Deputy has a duty to make a referral to Adult Social Care, whenever there is reason to suspect that a vulnerable adult is suffering, or likely to suffer, significant harm.

- 4.5 The Designated Safeguarding Lead or a Deputy may contact Adult Social Care for advice, if unsure as to whether a referral is appropriate.
- 4.6 The Designated Safeguarding Lead or a Deputy will make every effort to attend any meetings resulting from the safeguarding process to which the college is invited.
- 4.7 The Designated Safeguarding Lead is responsible for ensuring that any actions agreed at such meetings are progressed and followed up.
- 4.8 The consent of the abused person should be sought before a referral to Halton Borough Council Adult Social Care is made. However, there may be circumstances where there is a need to overrule their wishes. For example:
- If the person is not making an informed decision or choice, or where this is uncertain
 - If the vulnerable adult or others affected by the situation are in a life-threatening situation
 - If the vulnerable adult or other people are otherwise at risk
 - If a crime has been or may have been committed.
- 4.9 Any decision to overrule the wishes of the allegedly abused person should be recorded on the College's Cause for Concern form, with the reasons for such a decision, and a copy should be kept in the Vulnerable Adult File, held by the Programme Management Team Leader for Welfare.
- 4.10 In cases where the allegedly abused person wishes to self-refer to Halton Borough Council Social Care, the matter must still be referred to the Designated Safeguarding Officer, who should accordingly refer the matter to Social Care regardless of the individual's decision to self-refer.
- 4.11 The welfare of the person concerned, including the welfare of any other vulnerable adults or children who may be at risk, must always take precedence over confidentiality. Therefore, these procedures must be followed, irrespective of any request to maintain confidentiality.
- 4.12 The Designated Safeguarding Lead and deputies must complete safeguarding training relevant to their role. This level of training must be updated at least every two years, with further safeguarding training to be accessed on a minimum of an annual basis. This is to ensure designated staff have appropriate, up to date knowledge and skills which will enable them to identify concerns and make decisions that support the safety of the college community.
- 4.13 All staff working in the college must be given a copy of the Vulnerable Adults Safeguarding Policy immediately upon starting work at the college as part of their induction.
- 4.14 Targeted staff working in the College will be given appropriate staff development related to safeguarding vulnerable adults as part of their induction and at a minimum of every three years thereafter.
- 4.15 The Governing Body will undergo safeguarding training specific to their role and responsibilities at a minimum of every three years. The Designated Governor for Safeguarding will attend appropriate Roles and Responsibilities training at least every two years.

- 4.16 A summary of safeguarding cases and pertinent safeguarding issues that have been dealt with by the College will be reported to the Board of Governors on at least an annual basis. All reporting to the Board of Governors will be anonymised and will contain enough detail to allow appropriate scrutiny and oversight.
- 4.17 The Board of Governors shall be responsible for ensuring that the College has up to date policies in place with respect to safeguarding vulnerable adults.
- 4.18 The Board of Governors will ensure that the College operates safer recruitment procedures including:
- at least one member of every recruitment panel having completed approved Safer Recruitment training
 - appropriate DBS checks completed for staff (including Barred List checks and teacher prohibition and relevant overseas checks where appropriate)
 - where appropriate, checks made regarding specific staff whose duties fall within the Childcare (Disqualification) Regulation 2009
 - the maintenance of an accurate Single Central Record

5.0 ROLES & RESPONSIBILITIES OF STAFF

- 5.1 All staff across the college community are well placed to identify concerns and have individual responsibility for reporting such concerns to the Designated Safeguarding Lead or a Deputy.
- 5.2 Staff will ensure that they are able to recognise possible indicators of abuse and neglect (see Appendix 3 for further information) and know who to report their concerns to.
- 5.3 Staff will report any safeguarding concerns to a Safeguarding officer without delay and in a timely fashion. Verbal reporting of concerns will then be followed up in writing as soon as possible but always within 24 hours. Rather than thinking, "*what if I'm wrong?*" staff are encouraged to think, "*what if I'm right?*" in relation to any safeguarding concerns.
- 5.4 Staff will ensure that they record their concerns using the College's standard recording format (Appendix 1) in a contemporaneous fashion, clearly noting the difference between fact and opinion and where the information has come from. The voice of the vulnerable adult will be made clearly evident.
- 5.5 Staff will ensure that concerns relating to a vulnerable adult remain confidential and are only shared with the Safeguarding Officer.
- 5.6 Staff will co-operate with safeguarding enquiries made by Adult Social Care in relation to our students.
- 5.7 Staff will develop effective links with other agencies in the interests of health and wellbeing.
- 5.8 Staff will ensure that they attend full Level 2 Basic Awareness in Safeguarding training appropriate to their role at least every three years and will attend further update training annually. This includes training regarding the Prevent Duty.

- 5.9 Staff will ensure that they are familiar with and understand all College safeguarding related policies and procedures.
- 5.10 Staff will provide a safe environment in which vulnerable adults can learn and will have a belief that *“it could happen here”*.
- 5.11 Staff are aware that teachers should safeguard the wellbeing of vulnerable adults and maintain public trust in the teaching profession as part of their professional duties
- 5.12 Staff understand that it may be appropriate to discuss with the Deputy Principal matters outside of work, which may have implications for the safeguarding of vulnerable adults in the workplace. This includes information about themselves. Staff will ensure that they are aware of the circumstances where this would be applicable.
- 5.13 Staff understand that failure to follow any of the procedures set out within this policy may result in disciplinary action being taken by the college.

6.0 ROLES & RESPONSIBILITIES OF DESIGNATED SAFEGUARDING LEAD

The Governing Body will ensure that an appropriate senior member of staff is appointed to the role of Designated Safeguarding Lead. The Designated Safeguarding Lead (DSL) will be a member of the Senior Leadership team and the role will be explicit within their job description. This person will have the appropriate status and authority within the college to carry out the duties of the post. They will be given the time, funding, training, resources and support to provide advice and support to other staff, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of vulnerable adults. He / she will undertake the following as part of the role:

- Provide support, advice and guidance to colleagues
- Recognise signs / indicators of abuse and decide when referrals to Adult Social Care / other relevant agencies are appropriate. This should include identification of cases where Early Intervention would be appropriate
- Liaise with relevant agencies (where appropriate) to inform the decision on whether to make a referral to Adult Social Care
- Liaise with Principal (where the role is not carried out by the Principal) to inform him / her of any issues or on-going investigations. Ensure there is always cover for the DSL role by having a named deputy or team of deputies
- Ensure that the named deputy or deputies are trained to the same level of the DSL and that the role is also explicit within their job description
- Lead a team of Deputy Safeguarding Leads if the establishment is large enough to require this (including providing effective support and supervision to these colleagues)
- Attend and effectively contribute to meetings or plans requested by other agencies
- Provide written reports at such meetings using the Local Authority report template
- Keep detailed, accurate and secure written records of referrals and concerns. Ensure these records are stored in a locked filing cabinet and are not accessible by staff / students
- Monitor and track the progress of all vulnerable students
- Provide the Governing Body with an up to date analysis of safeguarding related issues and numbers of vulnerable students to enable them to scrutinise, challenge and support the College as necessary

- Ensure the College's safeguarding related policies are up to date and reviewed annually. Work with the Governing Body / Designated Governor regarding this.
- Ensure every member of staff has access to and understands the College's safeguarding-related policies (including whistleblowing, etc.)
- Ensure students are aware of the Safeguarding Vulnerable Adults Policy
- Ensure that the most up to date version of the Safeguarding Vulnerable Adults Policy is available to download from the College website and that appropriate safeguarding information is displayed to website visitors
- Ensure all staff have induction training which covers safeguarding and are able to recognise and report any concerns immediately when they arise, including the fact that there is also the possibility of peer on peer abuse
- Ensure that all staff have full Level 2 Basic Awareness in Safeguarding training at least once every three years, and ensure that all staff receive safeguarding update training on a minimum of an annual basis. Keep accurate records of staff participation in this
- Ensure that all staff have completed training in relation to their Prevent Duty
- Ensure all staff are aware of and adhere to the College's Guidelines for Safer Working Practice. Ensure that this includes references to online conduct and e-safety and is reviewed on an annual basis
- Attend Level 3 multi-agency Working Together training, and subsequent Refresher training every 2 years
- Continually update safeguarding knowledge by attending appropriate Level 3 multi-agency safeguarding training on a minimum of an annual basis
- Ensure safe messages are displayed in reception / visitor areas and that appropriate checks are made on entry to the College. Ensure visitors to the establishment are aware of who the DSL and deputies are and how to share concerns should they arise
- Share and disseminate good practice within own college and within the local area

7.0 ROLES & RESPONSIBILITIES OF GOVERNING BODY AND DESIGNATED GOVERNOR

- 7.1 Governing bodies are responsible for ensuring the College's policies and procedures for safeguarding. All governors have a responsibility to ensure the College's safeguarding measures meet statutory requirements and all should know what to do if they have concerns about a vulnerable adult.
- 7.2 The Designated Safeguarding Lead should liaise with the Designated Governor for Safeguarding so that the Designated Governor can report to the governing body about safeguarding issues. Reports to the governing body should not be about specific cases, but should review the safeguarding policies and procedures. It is good practice for the Designated Governor and the Designated Safeguarding Lead to present the report together.

8.0 PROCEDURES REGARDING SAFEGUARDING CONCERNS

- 8.1 All members of the College community have a statutory duty to safeguard and promote the welfare of vulnerable adults. If any member of the College community has a safeguarding concern, they should contact a Safeguarding officer **immediately**. Staff and governors should not investigate possible abuse or neglect themselves.
- 8.2 Injuries noted should be reported to the Safeguarding Officer immediately as it is acknowledged that once an injury occurs, the body will start to heal and therefore evidence will start to diminish.

- 8.3 The Safeguarding Officer will consider the information they have received and will determine what action should be taken. He/she must record the outcome of this decision making process.
- 8.4 If the Safeguarding Officer is unsure as to whether the presenting concern reaches the threshold for referral to Adult Social Care they should contact the Team
- 8.5 Adult Social Care contact details are as follows:
- **Halton Borough Council Adult Social Care Services on 0151 907 8306**
 - **Out of hours Emergency Duty Team (EDT): 0345 050 0148**
- 8.6 The Safeguarding Officer will complete, in detail, the multi-agency referral form (available on the Halton Safeguarding Children Board website www.haltonsafeguarding.co.uk). He/she will include as much detail as possible relating to the concern, to enable Adult Social Care to react in a timely way. This referral form must be completed within a maximum of 48 hours but sooner when requested.

9.0 PROCESS TO FOLLOW IF A VULNERABLE ADULT MAKES A DISCLOSURE

If a vulnerable adult makes a disclosure of abuse to you:

You should:

- Listen and keep calm. Do not interrupt
- You MUST NOT promise the vulnerable adult that you will keep the matter confidential. Explain to them who you will need to tell and why
- Keep questions to a minimum, as your role is not to investigate. If you need to ask questions in order to ascertain whether this is a safeguarding concern, ensure they are open questions
- Make a record of what has been said immediately afterwards in words used by the vulnerable adult and yourself to the best of your memory.
- Note anything about the vulnerable adult which is connected i.e. any visible injuries including the position and description, the demeanor of the vulnerable adult i.e. crying, withdrawn etc.
- Clearly indicate whether fact, opinion or third party information
- Report the matter immediately to a Safeguarding Officer
- If in doubt seek advice from the Safeguarding Team

You should not:

- Ask leading questions or press for details
- Rush the vulnerable adult
- Examine the vulnerable adult
- Investigate
- Promise confidentiality
- Summarise or use your own words to describe events
- Delay sharing the information with a Safeguarding Officer

10.0 CONFIDENTIALITY

- 10.1 The College recognises that all matters relating to safeguarding are confidential.
- 10.2 The Principal, Designated Safeguarding Lead and/or Deputy will disclose any information about a vulnerable adult to other members of staff on a need to know basis only. Guidance about sharing information can be found in the 2018 document "[Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2018](#)"
- 10.3 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard vulnerable adults.
- 10.4 All staff must be aware that they cannot promise confidentiality which might result in the vulnerable adult's safety or wellbeing being compromised.
- 10.5 The College pays due regard to the relevant data protection principles which allow us to share personal information, as provided for in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). The College is aware of the processing conditions under the Data Protection Act 2018 and the GDPR which allow us to store and share information for safeguarding purposes, including information which is sensitive and personal, and this is treated as "special category personal data". Where we would need to share special category personal data, we are aware that the Data Protection Act 2018 contains "safeguarding of children and individuals at risk" as a processing condition that allows us to share information. This includes allowing college to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that we can gain consent, or if to gain consent would place a vulnerable adult at risk.

11.0 RECORDING AND MAINTENANCE OF RECORDS

- 11.1 All safeguarding concerns should be recorded on the Cause for Concern Form (Appendix 1). Staff making records will ensure that they clearly distinguish between fact and opinion and whether the information is 1st or 2nd hand. Records will clearly evidence the voice of the vulnerable adult and will always be written contemporaneously.
- 11.2 Records will be maintained in a Safeguarding File. (See Appendix 2 for exemplar front sheet for File.)
- 11.3 Individual files should be clearly organised in chronological order and all entries should be signed and dated in a legible manner by the person making the entry. This should include their role/designation at the College. There should be a chronology of events kept on file to enable the Designated Safeguarding Lead and Deputy to have an immediate overview of the case.
- 11.4 Such records will be kept in a secure locked filing cabinet.
- 11.5 Files will be archived and securely stored.

12. ALLEGATIONS MANAGEMENT

- 12.1 It is essential that any allegation of abuse made against a member of staff or volunteer in an education setting is dealt with fairly, quickly and consistently to provide effective protection for the vulnerable adult and at the same time support the person subject to the allegation.
- 12.2 Any individual who has concerns or receives information in which it is alleged that a member of staff/volunteer has:
- behaved in a way that has harmed or may have harmed a vulnerable adult;
 - possibly committed a criminal offence against or related to a vulnerable adult; or
 - behaved toward a vulnerable adult or adults in a way that indicates s/he is unsuitable to work with vulnerable adults
- must report the matter without delay to the Principal or designated member of the Senior Management Team.
- 12.3 In circumstances where the concern/allegation is in relation to the Principal, reports should be made without delay to the Chair of Governors.
- 12.4 A safeguarding concern will always exist, and therefore these Procedures must be followed, whenever a member of staff is observed to subject, or is accused of subjecting a vulnerable adult to any abusive behaviour.
- 12.5 The Senior Designated Safeguarding Officer will consult with Social Care to determine:
- if there is a need to undertake preliminary enquiries and, if so, how the enquiries should be conducted or;
 - if there is sufficient information available to conduct an investigation under Vulnerable Adult Protection Procedures;
 - whether immediate action to protect a Vulnerable Adult is required.
- 12.6 In the instance of an allegation of abuse of a vulnerable adult, made against the Principal, the Chair of Governors would liaise directly with Halton Borough Council Adult Social Care.
- 12.7 Preliminary enquiries should be made by Designated Safeguarding Officer, after consultation with Halton Borough Council Adult Social Care.
- 12.8 The enquiries should be minimal to establish the facts of the allegation if these were not established or were unclear at the time the original concern was raised, i.e. date, time, place of any alleged incident, any witnesses and other relevant factors.
- 12.9 In-depth questioning of vulnerable adults or professionals/professional carers should not take place.
- 12.10 Careful records should be made regarding any concerns or allegations and actions taken in response to these.
- 12.11 Further consultation with Halton Borough Council Adult Social Care should then take place to establish the most appropriate next step.

- 12.12 When an allegation is made a number of inter-related elements will exist (Safeguarding, Criminal Investigation, Disciplinary, Complaints).
- 12.13 Halton Borough Council Adult Social Care will therefore have the key role in co-ordinating the relevant elements and ensuring that all subsequent stages of the Vulnerable Adult Protection Procedures are followed. They will also be involved in the college's decision to inform the Independent Safeguarding Authority of any relevant information.
- 12.14 If any individual is unhappy that their concerns are not being taken seriously within the College, they should raise their concerns with the Designated Safeguarding Officer, and consultation with Social Services must take place.
- 12.15 Where there is no criminal offence and Police are not leading on an investigation, any investigation undertaken by the College will be timely, thorough, consistent and fair to all parties involved in order to reach the correct conclusion and outcome. The College will endeavour to complete this investigation as quickly as possible.
- 12.16 As a result of an investigation if any member of staff is found not suitable to work with vulnerable adults the College will refer the individual to the Disclosure and Barring Service (DBS) for consideration for barring. This includes where the member of staff resigns prior to conclusion of the investigation, the member of staff is dismissed, or when the college ceases to use their service as a result of a substantiated allegation. Where appropriate, consideration will also be given to referral to the Teaching Regulation Agency for possible prohibition from teaching.
- 12.17 The College will not use "compromise" or "settlement agreements" if the member of staff is not suitable to continue in their employment with Vulnerable Adults.
- 12.18 The College recognises that there are occasions when a person who works with Vulnerable Adults behaves in a way that is concerning and raises questions about their ability to recognise and take steps to safeguard vulnerable adults in their care. As an employer the College has a duty to consider whether the issue indicates that they are unsuitable to continue in their role for the immediate future or indefinitely. These are known as issues of suitability and would be dealt with via the College's disciplinary procedures. Issues of suitability can include:
- Where an employee is being investigated for an offence against an adult, or
 - Their behaviour in their personal lives brings into question their suitability to work with Vulnerable Adults
- 12.13 Staff in College should ensure that they disclose information about themselves relating to the above to the Principal as soon as possible. The College will create an environment and culture where staff are able to do this.

13.0 WHISTLEBLOWING

- 13.1 The College recognises that vulnerable adults cannot be expected to raise concerns in an environment where staff fail to do so.
- 13.2 All staff should be aware of their duty to raise concerns, where they exist, which may include the attitude or actions of colleagues. The College's Whistleblowing Policy is there to support and aid them in these circumstances.

- 13.3 Whistleblowing regarding the Principal should be made to the Chair of the Governing Body, whose contact details should be readily available to staff.

14.0 ESCALATION

- 14.1 If any member of staff is unhappy with the response they have received in relation to a safeguarding concern they have raised, it is their responsibility to ensure they escalate their concern.
- 14.2 Where professional disagreement occurs and the Designated Safeguarding Lead and/or Deputy are unhappy with the actions or decisions of another agency, they will escalate their concern in line with Halton Safeguarding Children Board's formal escalation policy to ensure a timely resolution. The escalation policy can be located here: www.proceduresonline.com/pancheshire/halton/p_escalation_pol.html?zoom_highlight=escalation

15.0 PROACTIVE SAFEGUARDING

- 15.1 The College recognises that it plays a significant part in the prevention of harm to vulnerable adults by providing them with opportunities to learn, good lines of communication with trusted staff, supportive peers and an ethos of protection.
- 15.2 The College recognises that it may provide the only stability in the lives of vulnerable adults who have been abused or who are at risk of harm.
- 15.3 The College recognises that safeguarding incidents and/or behaviours can be associated with factors outside the College. All staff, but especially the Designated Safeguarding Lead and deputy should consider the context within which such incidents or behaviours occur. This is known as contextual safeguarding, which means assessments of Vulnerable adults should consider whether wider environmental factors are present that are a threat to their safety and/or welfare.
- 15.4 The College community will:
- Work to establish and maintain an ethos where Vulnerable Adults feel secure and are encouraged to talk and are always listened to. This ethos will be modelled and replicated by staff and governors.
 - Promote a caring, safe and positive environment within the college.
 - Ensure that the College site is a safe, secure and welcoming place to learn.
 - Encourage self-esteem and self-assertiveness through the curriculum as well as through personal relationships, whilst not condoning aggression or bullying.
 - Ensure that all vulnerable adults know there is a member of staff in the College whom they can approach if they are worried or in difficulty.
 - Include safeguarding messages across the curriculum, to ensure that vulnerable adults are equipped with the skills they need to recognise risky behaviours, stay safe from harm and to know to whom they should turn for help.
 - Offer a positive college experience.

Ensure all staff are aware of College guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

16.0 SAFEGUARDING STUDENTS WHO ARE VULNERABLE TO EXTREMISM

- 16.1 Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 16.2 The College values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 16.3 Under duties imposed within the Prevent Duty Guidance 2015 as part of the Counter-Terrorism and Security Act 2015, The College will ensure that situations are suitably risk assessed, that they will work in partnership with other agencies, that all staff are suitably trained and that IT policies will ensure that children and young people are safe from terrorist and extremist material when accessing the internet in College.
- 16.4 The School Lead (Single Point for Contact) for Prevent is: Thalia Bell/Paula Mitchell.
- He/she will link with other relevant agencies (including the Police) to ensure that vulnerable people are appropriately supported and risk assessed, and that all staff and Governors have received training to ensure they are able to recognise any concerns. The specific Roles and Responsibilities of this Single Point of Contact (SPOC) are defined in Appendix 3.
- 16.5 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The College is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 16.6 Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are contained in Appendix 3.
- 16.7 The College seeks to protect Vulnerable Adults ,children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

16.8 The Channel and Prevent contacts within Cheshire Constabulary are:

Sian Roberts sian.roberts@cheshire.pnn.police.uk
DC Lesley Price lesley.price@cheshire.pnn.police.uk
DC Andrew McIntyre andrew.mcintyre@cheshire.pnn.police.uk
DC Brendan Crilley Brendan.Crilley@cheshire.pnn.police.uk

Team email prevent@cheshire.pnn.police.uk

Alternatively there are the following national contacts available:

Anti-Terrorist Hotline 0800 789 321
Text Phone Service 0800 032 4539
Web site <https://secure.met.police.uk/athotline/>

Appendix 1

**Riverside
College**

Widnes & Runcorn

**Safeguarding
Cause for Concern Form
Confidential**

Name of child/vulnerable adult:		
Gender: male	DOB:	Student Ref No:
Does the child/vulnerable adult know you are speaking to a safeguarding officer? Yes <input type="checkbox"/>		
Reason for concern: (State what child/vulnerable adult said, or what you observed that caused suspicion. <u>Include</u> <u>date</u> , and time of event. Where reporting what someone has said to you, try to use as close to their exact words as you can remember). <i>Continue on additional pages if necessary.</i>		
Category of abuse causing concern: (Tick any that apply) Physical <input type="checkbox"/> Sexual <input type="checkbox"/> Emotional <input type="checkbox"/> Neglect <input type="checkbox"/> Financial <input type="checkbox"/> Institutional <input type="checkbox"/>		

Whom have you spoken to and what was said?

Details of person completing this form.

Name: _____
Position: _____
Signature: _____
Date: _____

To be completed by a Safeguarding Officer

State what action was taken and when *(continue on additional pages if necessary).*

Name: _____
Signature: _____
Date: _____

Please input summary onto Safeguarding spreadsheet

SUMMARY SHEET

STUDENT DETAILS

NAME:		DOB:	
COURSE	ETHNICITY:	SEN STATUS:	
ADDRESS:			
PARENT / CARERS:			
PHONE NUMBERS:			
RELEVANT STAFF IN SCHOOL:			

AGENCIES INVOLVED

AGENCY	NAMED PERSON	CONTACT DETAILS
CHILDREN'S SOCIAL CARE		
EARLY INTERVENTION		
CAF LEAD PROFESSIONAL		
EDUCATION WELFARE OFFICER		
SCHOOL HEALTH		
GP DETAILS		
FAMILY SUPPORT WORKER		
EDUCATION PSYCHOLOGIST		
POLICE		

BRIEF SUMMARY OF FACTS

Include details such as significant family members, family members who should not be contacted, sibling details (including their schools), etc.

INDICATORS OF ABUSE IN CHILDREN AND SPECIFIC SAFEGUARDING ISSUES

The risk indicators described in this appendix are frequently found in cases of child abuse. Many of these may be indicators of abuse of vulnerable adults as well. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with Designated Safeguarding Lead
- May require consultation with and / or referral to Children's Services

However, it is important to note that the absence of such indicators does not mean that abuse or neglect has not occurred.

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour / attendance at school
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises / injuries with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour

In an abusive situation, the child may:

- Appear frightened of the parent/s or other adults or children
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent
- Be misusing substances (alcohol or drugs)
- Have mental health issues that compromise parenting ability
- Persistently refuse to allow access on home visits
- Be a victim or a perpetrator of domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household. Staff should also be aware of the potential for peer on peer abuse in that abuse can be perpetrated by children or young people in addition to adults.

In relation to any of the signs and indicators described below, staff should ensure that they follow procedures set out in parts 4.0 and 8.0 of the main policy as detailed above.

RECOGNISING PHYSICAL ABUSE

Children will have accidental injuries. All injuries noted by staff should be responded to, regardless of whether the member of staff suspects it is an accidental injury. The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- Family use of different doctors, urgent treatment centres (e.g. Walk-in centres) and A&E departments
- Reluctance to give information or mention previous injuries
- Absence from school (which may be used to hide injury from professionals)
- Depression and anxiety
- Aggression and violence
- Difficulties with relationships and socialising
- Trying to hide injuries (e.g. under clothing) – reluctance to get changed for PE
- Becoming distant or withdrawn
- Going missing from home
- Not wanting to go home from school

Injuries to children should always be addressed immediately in order to prevent evidence from disappearing. This is particularly pertinent in the case of visible slap / scratch marks.

Injuries caused by Physical Abuse

Bruising

- On the cheeks, ears, palms, arms and feet
- On the back, buttocks, tummy, hips and backs of legs
- Any bruising to a non-mobile child
- Multiple bruising in clusters, usually on the upper arms or outer thighs
- Bruises which look like they have been caused by fingers, a hand or an object (the outline of an object used e.g. belt marks, hand prints or a hair brush)
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times

Burns and Scalds

- Burns on the backs of hands, feet, legs, genitals or buttocks
- Burns which have a clear shape, e.g. a cigarette burn or lineal burns
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water on his/her own accord will struggle to get out and cause splash marks)

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

RECOGNISING EMOTIONAL ABUSE

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay – physical, emotional and mental
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or non-attachment
- Aggressive / violent behaviour
- Scapegoated within the family
- Problems with relationships and socialising
- Rebellious behaviour
- Low self-esteem and lack of confidence – can manifest as eating disorders or self-harming behaviours
- Withdrawn or seen as a “loner” – difficulty relating to others (self-isolating behaviour or negative impulsive behaviour)

RECOGNISING NEGLECT

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- Poor supervision of child
- Poor hygiene (e.g. dirty or smelly)
- Unwashed / inadequate clothing
- Untreated health problems or frequent missed medical / dental appointments
- Frequent, untreated bouts of head lice
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school / poor punctuality
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

- Poor school attendance / punctuality
- Withdrawn / isolated
- Problems with relationships and socialising

Within Halton, the Graded Care Profile is used as a recognised tool for the assessment of neglect. Further information regarding this can be found on the Halton Safeguarding Children Board website.

RECOGNISING SIGNS OF SEXUAL ABUSE

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family. Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Risk taking behaviour (during adolescence)
- Promiscuous behaviour
- Aggressive behaviour
- Withdrawn or isolated
- Unexplained gifts, toys or favours
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)
- Pain or itching of genital area
- Blood on underclothes
- Bed wetting or soiling
- Sleep problems
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted infections, presence of semen on vagina, anus, external genitalia or clothing

The Brook Sexual Behaviours Traffic Light Tool is available for professionals who work with children to help identify, assess and respond appropriately to sexual behaviours <http://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool>

RECOGNISING CHILD SEXUAL EXPLOITATION

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation. Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts, or gifts from unknown sources

- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- unknown adults collecting the children from school
- having older boyfriends or girlfriends
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- repeat absences / truancy from school (e.g. same time of day, same day each week, etc.)
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- frequent missing from home episodes
- getting involved in crime, police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault

RECOGNISING SEXTING / YOUTH PRODUCED SEXUAL IMAGERY

Whilst professionals refer to the issue as “sexting”, there is no clear definition of “sexting”. Many professionals consider sexting to be “sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet” yet when young people are asked, “What does sexting mean to you?” they are more likely to interpret sexting as “writing and sharing explicit messages with people they know”. Similarly, many parents think of sexting as flirty or sexual text messages rather than images. “Youth produced sexual imagery” best describes the practice because:

- “Youth produced” includes young people sharing images that they, or another young person, have created of themselves
- “Sexual” is clearer than “indecent”. A judgement of whether something is ‘decent’ is both a value judgement and dependent on context
- “Imagery” covers both still photos and moving videos

Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks that need careful management.

The Law

Making, possessing and distributing any imagery of someone under 18, which is “indecent”, is illegal. This includes imagery of yourself if you are under 18. Specifically:

- It is an offence to possess, distribute, show and make indecent images of children.
- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

The types of incidents that this covers are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

This does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery

This does mean that young people are breaking the law by sharing such images, however whilst young people creating and sharing sexual imagery can be very risky, it is often the result of young people's natural curiosity about sex and their exploration of relationships. Often, young people need education, support or safeguarding, not criminalisation.

Whilst it is recognised that the production of such imagery is likely to take place outside of school, issues often manifest in school. As a result it is expected that:

- All members of staff should be able to recognise and refer any disclosures of incidents of this nature
- All incidents of youth produced sexual imagery should be dealt with as safeguarding concerns and school safeguarding procedures should be followed
- Adults should not view youth produced sexual imagery unless there is good and clear reason to do so

If staff have any concerns regarding sexting or any disclosures are made, they should *always* follow the school's safeguarding procedures and refer to the DSL / Deputy. They should *never* view, print, copy or share any images themselves; this is illegal.

The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the child protection policy and procedures of the school or college. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil. If a decision is made to view imagery the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery then the DSL should:

- Never copy, print or share the imagery; this is illegal
- Discuss the decision with the Head teacher

- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Head teacher
- Ensure viewing takes place with another member of staff present in the room, ideally the Head teacher or a member of the senior leadership team. This staff member does not need to view the images
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Head teacher or a member of the senior leadership team's office
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents

RECOGNISING SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

The College considers that it is important all staff are aware of the difference between sexual violence and sexual harassment in order to help identify and report any concerns.

What is sexual violence?

Under the Sexual Offences Act 2003, offences relating to sexual violence are described below:

- **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

What is sexual harassment?

Sexual harassment is "unwanted conduct of a sexual nature" that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a

hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

RECOGNISING HARMFUL PRACTICES (FEMALE GENITAL MUTILATION, FORCED MARRIAGE AND HONOUR BASED ABUSE)

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. FGM is internationally recognised as a violation of human rights of girls and women. There are 4 types of procedure:

- Type 1, Clitoridectomy - partial/total removal of clitoris
- Type 2, Excision - partial/total removal of clitoris and labia minora
- Type 3, Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4, all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

It is carried out because there is a belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- It preserves a girl’s virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement / perpetuates a custom or tradition

- Helps girls be clean / hygienic
- Is cosmetically desirable
- It is mistakenly believed to make child birth easier

Indicators that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child’s family being from one of the “at risk” communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesian and Pakistani)
- Knowledge that the child’s sibling has undergone FGM
- Child talks about going abroad to be “cut” or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to stand, sit or walk. Looking uncomfortable when undertaking these activities
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infections
- Disclosure

Mandatory Reporting of FGM

Teachers *must* personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college’s designated safeguarding lead and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

If there are suspicions regarding FGM, it is essential that schools take action **immediately**. If there are concerns that a child is at risk of, or is a victim of, FGM contact the NSPCC FGM helpline anonymously 24/7 on 0800 028 3550 or fgmhelp@nspcc.org.uk

Forced Marriage (FM)

A Forced Marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

Forced Marriage is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological, for example, when someone is made to feel like they are bringing shame on their family. Financial abuse (taking the person's wages or not giving them any money) can also be a factor.

Often those about to be forced into marriage cannot talk about what is happening to them because of the emotional pressure they are under from family. If there are suspicions regarding Forced Marriage following talking to the child, it is essential that school takes action **immediately**. (In cases of forced marriage, involving the family and the community may increase the risk of significant harm to the child or young person. The family may deny that the child or young person is being forced to marry and they may expedite any travel arrangements and bring forward the marriage.) If there are concerns that a child is at risk of FM school should contact the Forced Marriage Unit helpline for advice on 0207 008 0151.

Honour Based Abuse (HBA)

Honour based abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. The terms "honour crime" or "honour-based abuse" or "izzat" embrace a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community. They are being punished for actually, or allegedly, undermining what the family or community believes to be the correct code of behaviour.

It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

In disobeying this correct code of behaviour, the person shows that they have not been properly controlled to conform by their family and this is to the "shame" or "dishonour" of the family. It can be distinguished from other forms of abuse, as it is often committed with some degree of approval and/or collusion from family and/ community members. Victims will have multiple perpetrators not only in the UK; HBA can be a trigger for a Forced Marriage.

INDICATORS OF FM OR HBA

- Absence and persistent absence
- Request for extended leave of absence and failure to return from visits to country of origin
- Fear about forthcoming school holidays
- Surveillance by siblings or cousins at school
- Decline in behaviour, engagement, performance or punctuality
- Poor exam results
- Being withdrawn from school by those with parental responsibility
- Not allowed to attend extra-curricular activities
- Sudden announcement of engagement to a stranger
- Prevented from going on to further / higher education
- Accompanied to doctors or clinics by family members
- Self-harm / attempted suicide / depression / isolation
- Running away from home
- Eating disorders

- Substance misuse
- Siblings forced to marry / early marriage of siblings
- Self-harm or suicide of siblings
- Death of a parent
- Family disputes

If there are suspicions regarding Forced Marriage or Honour Based Violence following talking to the child, it is essential that school take action **immediately**. In cases of Forced Marriage and Honour Based Abuse, involving the family and the community may increase the risk of significant harm to the child or young person. If there are concerns that a child is at risk of FM school should contact the Forced Marriage Unit helpline for advice on 0207 008 0151 or in either case contact 999 if the situation is deemed to be an emergency.

RECOGNISING CHILD CRIMINAL EXPLOITATION (CCE)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of “County Lines” criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from one area to another, typically from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRM) should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

The following list of indicators is not exhaustive or definitive but it does highlight common signs that can assist professionals in identifying children or young people who may be victims of sexual exploitation. Signs include:

- Persistently going missing from school or home and / or being found out-of-area
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

RECOGNISING PEER ON PEER ABUSE

Children can abuse other children. Peer on peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others. All staff should be aware of safeguarding issues from peer abuse including:

- Bullying (physical, name calling, homophobic, etc., including cyber bullying)
- Gender based violence
- Sexually harmful behaviour and sexting

This abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, culture, sexual identity, disability, special educational needs or other differences and can result in significant, long lasting and traumatic isolation, intimidation or violence to the victim.

Recognising and responding to peer abuse

Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can often be more damaging than physical. An assessment of an incident between peers should be completed and should consider the following:

- Chronological and developmental ages of everyone involved
- Difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability
- All alleged physical and verbal aspects of the behaviour and incident
- Whether the behaviour involved inappropriate sexual knowledge or motivation
- What was the degree of physical aggression, intimidation, threatening behaviour or bribery
- The effect on the victim
- Any attempts to ensure the behaviour and incident is kept a secret
- The child or young person's motivation or reason for the behaviour, if they admit that it occurred
- Whether this was a one-off incident, or longer in duration

Children or young people who harm others may have additional or complex needs e.g.:

- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse
- Educational under-achievement
- Involved in crime

It is important to develop appropriate strategies in order to prevent the issue of peer-on-peer abuse rather than manage the issues in a reactive way. Even with the most stringent of policies and support mechanisms, peer abuse can and may still occur. In order to try to prevent the College will:

- Have an ethos where students and staff treat each other with respect and understand how their actions affect others
- Ensure that the school environment is one that allows students to share information about anything that is upsetting or worrying them
- Use a strong and positive PSHCE curriculum to tackle issues such as prejudiced behaviour, and gives an open forum for young people to talk
- Openly discuss any issues that could motivate bullying with staff and students
- Address issues early between pupils which might later provoke conflict
- Develop strategies to help to prevent bullying
- Involve students and parents to ensure they know what to do to prevent and report concerns
- Create an inclusive, safe environment where pupils can openly discuss issues without fear
- Invest in skills to help staff understand the needs of SEND, disabled and lesbian, gay, bisexual and transgender pupils through staff training and CPD to ensure that staff do not dismiss issues
- Work with the wider community and agencies to tackle issues that occur outside the setting

For further information, staff should refer to College's Anti Bullying Policy.

CONTEXTUAL SAFEGUARDING

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families and outside of their home. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

More information about Contextual Safeguarding can be found here: <https://contextualsafeguarding.org.uk/>

CHILDREN MISSING EDUCATION (CME)

Children Missing Education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Maintained schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. When a child is deemed to be missing from education, Schools must make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register. Once these enquiries have been undertaken, the local protocol for Children Missing Education must be followed.

RECOGNISING VULNERABILITIES TO EXTREMISM AND RADICALISATION

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as:

"Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"

Extremism is defined by the Crown Prosecution Service as:

"The demonstration of unacceptable behaviour by using any means or medium to express views which:

- *Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;*
- *Seek to provoke others to terrorist acts;*
- *Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or*
- *Foster hatred which might lead to inter-community violence in the UK"*

There is no such thing as a "typical extremist"; those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that College staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- **Identity Crisis** – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- **Personal Crisis** – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- **Personal Circumstances** – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- **Unmet Aspirations** – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- **Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- **Special Educational Need** – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list however is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

If there are suspicions regarding radicalisation or extremism, it is essential that Colleges take action without delay. If there are concerns that a child is at risk of radicalisation, or is voicing concerning opinions or attitudes, staff should contact the College lead (SPOC) for Prevent **without delay**. The College lead will then risk assess the information, make contact with, and take advice from the appropriate agencies.

PREVENTING VIOLENT EXTREMISM - ROLES AND RESPONSIBILITIES OF THE COLLEGE'S SINGLE POINT OF CONTACT (SPOC)

- Ensuring that staff are aware of the role of the SPOC in relation to protecting pupils from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing pupils from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of the College in relation to protecting pupils from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the school's RE curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;

- Raising awareness within the school about the safeguarding processes relating to protecting pupils from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the school for case discussions relating to pupils who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information in relation to referrals of vulnerable pupils into the Prevent / Channel* process;
- Attending Channel* meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Channel* Co-ordinator; and
- Sharing any relevant additional information in a timely manner.

*Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Cheshire Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.