

SAFEGUARDING VULNERABLE ADULTS' POLICY

2024 – 25

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 at College and in the wider community where possible.
 - Offer early help support to vulnerable adults as a preventative measure.
- 1.3 The College will strive to prevent abuse, neglect and exploitation 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, seek advice and guidance on any safeguarding concerns, including those regarding colleagues or themselves.
- 1.4 Safeguarding will be reflected throughout the curriculum and will be contextualised to be appropriate for the curriculum area and our adult cohort.
- 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 and vulnerable adults 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. This will only be used in regard to a vulnerable adult where parental consent remains in place due to EHCP conditions, or where 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.

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 2024*
- Working together to safeguard children 2023 (last updated 2024)
- [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](#)
- [UKCIS 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
- Care Act 2014 ([Care Act factsheets - GOV.UK](#))
- *Voyeurism (Offences) Act 2019*

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, governors 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 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
- A peer from educational setting

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 Julia Withersby, Assistant Principal HR

In her absence, the Deputy Designated Safeguarding Lead is Donna Elston, Head of Student Services, Kingsway.

Safeguarding Officers are:

- Anna Hopwood – Kingsway
- Mandy Davies – Kingsway
- Joanne Brant – Kingsway
- Amy Clarke – Kingsway
- Rachel Bailey - CRMZ
- Helen Maddison – Cronton
- Jayne Barker – Cronton
- Katie Peacock – 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 online via STAR system, 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, Deputy or Safeguarding team member 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, Deputy or Safeguarding team member may contact Adult Social Care for advice, if unsure as to whether a referral is appropriate.
- 4.6 The Designated Safeguarding Lead, Deputy or Safeguarding team member 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 and Team are 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 (or any other Borough Council as required) 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 due to exceptional circumstances, threat or they are under the influence of drugs or alcohol.
 - If the vulnerable adult or others affected by the situation are in a life-threatening situation
 - If a crime has been or may have been committed.
 - If a child may be in danger due to a lack of intervention
- 4.9 Any decision to overrule the wishes of the allegedly abused person should be recorded on the College's on-line Safeguarding form with the reasons for such a decision.
- 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 access to 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 on-line referral process. Forms should be completed 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 kept confidential.
- 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 and then 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-line. 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 on-line in a secure Safeguarding File.
- 11.3 Individual files are kept in chronological order and all entries will be electronically signed and dated including their role/designation at the College.
- 11.4 Such records will be kept in a secure are on-line with limited access.
- 11.5 Old 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.

Any low level concerns that are reported are monitored via internal processes as per recommendation in Child Protection policy.

- 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 If a safeguarding concern is raised 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; (which may involve the Police)
 - 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
- 12.19 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:
<https://hcypsp.haltonsafeguarding.co.uk/procedures-guidance/>

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/Donna Elston.
- 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:
Team email prevent@cheshire.pnn.police.uk
Channel Coordinator Jess Livingstone 075621711771
Channel Police representative Mark Blake Mark.Blake@cheshire.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/>