





Recruitment • Training • Apprenticeships

# **Safeguarding Policy & Procedures**

Approved by:	Annette Hall
Review Frequency:	Annually
Last Review Date:	03/06/20





**This safeguarding policy** should be read in conjunction with the safeguarding guidance document and the following policies:

- Equality, Diversity and Inclusion
- Health and Safety
- Whistleblowing
- IT Policy
- Lone Working Policy

# What is Safeguarding?

Whereas "Child Protection" looks at recognising abuse and neglect and acting on it - "Safeguarding" looks at keeping young people and adults at risk safe from a much wider range of potential harm, whether from crime, other forms of abuse or from being drawn into terrorism-related activity and looks at preventative action, not just reaction. A number of high-profile cases including the Soham murders of 2001 and the Baby P tragedy and the more recent Westminster Attacks and Manchester attacks are painful reminders of the importance of safeguarding. Although preventative measures are never infallible, there remains a pressing responsibility to ensure that the most robust safety network possible is in place where young people and adults at risk are concerned.

## **Background Context:**

Grey Seal Academy is committed to maintaining the highest possible standards to meet its social, moral and legal responsibilities to safeguard the welfare of every child/young person or vulnerable adult (see Annex 5 for definitions) and thereby ensuring a safe and friendly environment, where they feel safe, comfortable and valued.

## **Grey Seal Academy believes that:**

- o Every child/young person or vulnerable adult (here in after referred to as learners/colleagues) has the right to exist in a safe and caring environment
- o All learners/colleagues have the right to expect an adult in a position of responsibility to listen to them when they need to express themselves
- o All learners and colleagues should be valued and respected as individuals
- o 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 is unacceptable
- o Bullying in any form is strictly unacceptable
- o Vocal or active calls for the death of members of the British armed forces is unacceptable.
- o Racist, homophobic and sexist language or behavior is strictly unacceptable
- o Any form of discrimination towards minority groups is strictly unacceptable
- o Safeguarding advice and guidance, along with sign posting resources including public protection units is readily accessible through our Grey Seal Academy safeguarding guidance within our Manager and Learner handbooks
- o The protection and safety of learners and colleagues is everyone's responsibility. All staff (including senior managers), partners and others have a responsibility to make the learning environment safe & secure for all

# Ignoring abuse is not an option

All staff must recognise this and must report any concerns for the well-being of learners and colleagues in accordance with this Policy, which has the full commitment of Grey Seal Academy's Senior Management Team.





## Purpose:

## This policy has been developed to:

- o Ensure that all staff in contact with learners and other Grey Seal Academy colleagues take all reasonable measures to assess and minimise the risk of harm to them, and;
- o Where there are concerns about the welfare including extremism and radicalisation of learners and other Grey Seal Academy colleagues, to ensure appropriate action is taken to address these concerns:
- o Provide staff with guidance on procedures they should adopt in the event that they suspect a learner and/or Grey Seal Academy colleague may be experiencing or be at risk of harm.

# To achieve this, Grey Seal Academy will:

- o Provide a safe environment for all colleagues and learners, through thorough risk assessment, putting in place safe working practices and implementing a procedure for handling direct disclosures.
- o Grey Seal Academy will consider and act on the '5 R's of Safeguarding' The 5 R's of Safeguarding should be Recognition, Response, Record, Referral and Review.
- o Have a Lead Designated Safeguarding Officer supported by a team of 'Designated Safeguarding Officers' for learner or colleague-related issues. All staff will be made aware of these roles.
- o Raise issues relating to the welfare of learners or colleagues with LDSO staff and senior managers.
- o Train staff who come into contact with learners appropriately and with regular updates.
- o Trainall staff on the 'Prevent Duty' including Chanel Awareness, British Values and were possible and available, formal qualifications.
- o Keep staff and managers up to date with legislation in relation to children, young people and vulnerable adults in respect of welfare, prevent duty and well-being.
- o Take appropriate action to ensure that learners and colleagues are kept safe and issues which are disclosed are reported appropriately.
- o Identify and act wherever it is found that learners and or colleagues are suffering, or likely to suffer, significant harm including concerns related to being drawn into terrorism-related activity.
- o Establish procedures for reporting and dealing with allegations of abuse.
- Listen to learners and colleagues, encourage an environment of mutual respect and tolerance for those with different faiths and beliefs and care for others and take action to stop any inappropriate verbal or physical abuse taking place.
- o Recruit safely (staff), ensuring that through risk assessment, appropriate questions and checks are undertaken at application, interview and throughout employment.
- o Ensure it meets the requirements of the Disclosure and Barring Service.
- o Ensure that subcontractors have appropriate safeguarding policies and procedures and that these are checked when tendering for work with Grey Seal Academy.
- o Have an effective information-sharing protocol with key partners such as employers in order to report concerns to outside agencies, where appropriate.
- o Ensure appropriate legislation is checked for currency and update this policy accordingly.
- o Promote the Policy and all that encompasses it to all GSA staff and other Employers, learners and other parties involved





## Responsibilities

This policy has been developed to:

- o Ensure that all staff in contact with learners and other Grey Seal Academy colleagues take all reasonable measures to assess and minimise the risk of harm to them, and;
- o Where there are concerns about the welfare including extremism and radicalisation of learners and other Grey Seal Academy colleagues, to ensure appropriate action is taken to address these concerns:

Grey Seal Academy's Lead designated safeguarding officer has the responsibility for Safeguarding. Grey Seal Academy's Senior Management Team will be involved regarding all Apprenticeship Safeguarding policy updates.

For learner/colleague-related issues, the Lead Designated Safeguarding Officer (LDSO) will take ownership in applying processes and providing support until the conclusion of the issue.

# **Sub-Contracting Safeguarding Compliance**

Grey Seal Academy is committed to maintaining the highest possible standards to meet its social, moral and legal responsibilities to safeguard the welfare of every child/young person or adult at risk.

Safeguarding also extends to the prevention of radicalisation and extremism and the embedding of British Fundamental Values in all that we do.

# **Effective Management of Safeguarding**

Grey Seal Academy will expect that an ongoing, robust and effective management of safeguarding, including compliance with the Prevent Duty is fully evident.

## The duties of the Managing director, Senior Management Team

#### - Are to ensure that:

- This policy is approved and endorsed by Grey Seal Academy Managing Director and Senior Management Team who commit to cascading it through the organisation and to key partners where appropriate
- This Policy and supporting procedures are fit-for-purpose and reviewed regularly
- o There are safe recruitment practices in place within the organisation
- There is a safeguarding training and implementation plan for the organisation
- Grey Seal Academy has safe and compliant Prevent Duty procedures and accurate and timely resources available for colleagues and learners to access.
- Liaison takes place with other appropriate agencies in line with Working Together to Safeguard Children
- Liaison takes place with employers to ensure that appropriate safeguards are put in place, including meeting the full requirements of the prevent duty
- The Senior Management Team remains up to date with developments in child, vulnerable adult and Prevent Duty protection issues.





# In addition, the duties of the Lead Safeguarding officer

#### - Are to ensure that:

- Senior Managers are aware of their responsibilities in regard of this policy as it relates to their particular area of the business e.g. recruitment, learning and development, commissioning services, Prevent Duty promotion of a safe environment
- Grey Seal Academy staff who work with learners are provided with appropriate safeguarding training
- If appropriate, they respond to individual cases, including attending case conferences and review meetings or deploying Designated Safeguarding Officers as appropriate
- A record of all complaints or concerns is kept, even if it does not lead to a referral and stored in line with GDPR policy (During periods of LDSO absence, records will be managed by the most senior DSO, ensuring that the Managing Director is made aware

## The duties of a Designated Safeguarding Officer are to ensure that:

- They have received training to at least level 2, in child and vulnerable adult protection and safeguarding issues and inter-agency working and will receive refresher training at least every 12 months
- Cases of suspected abuse or allegations are referred appropriately to relevant organisations and a proper record is kept of any referral and action taken and that this is kept safely and in confidence
- Advice and support is provided to learners and colleagues on issues relating to protection from abuse
- They respond to and investigate incidences as appropriate to the nature of the complaint and liaise with external multi-agency bodies where necessary
- They are available to listen to learners receiving Grey Seal Academy services

## **Promotion of Policy**

We will promote this policy through a range of methods, including, but not limited to:

#### To Staff:

- New staff inductions
- Undertaking professional development such as qualifications and internal training
- Awareness raising through regular discussions including making safeguarding a standard agenda item in meetings
- Share current affairs, topics and events that might form useful discussion with Learners

#### To Learners:

- Making the subject part of programme inductions and reference resources such as the Learner Welcome Pack
- Embed topics in training resources, discussions and learning activities
- By discussing during progress reviews

## To Employers

- Client Relationship Manager discusses with employers during initial engagement stages
- The employer pack is sent to employers which includes details of relevant policies including safeguarding and prevent procedures for disclosures
- Checking on learner welfare with the employer during progress reviews and when concerns are raised or otherwise noticed





## **Dealing with Allegations of Abuse**

In all cases where there are allegations of abuse, it is vital that these are dealt with fairly, quickly and consistently. There are four main strands to be considered:

- o An investigation of a possible criminal offence by the police
- Involvement of local police channel coordinator, designated officer and local prevent leads concerning radicalisation and extremism concerns
- Involvement of social services
- Investigation by Grey Seal Academy and/or an employer and consideration of any disciplinary action on staff or learners

## Allegations of Abuse against Grey Seal Academy Staff

Allegations of abuse, or concerns raised against members of Grey Seal Academy staff, will always be treated seriously. The allegation must always be referred to a Designated Safeguarding Officer who will follow the safeguarding procedure in the same way as for other safeguarding allegations.

The Designated Safeguarding Officer will take the appropriate steps to ensure the safety of the learner/colleague, and any others who may be at risk. The Designated Safeguarding Officer will also inform the Lead Designated Safeguarding Officer and will escalate to Senior Management stakeholders, Including the Managing Director in order that Grey Seal Academy procedures may be followed, and a disciplinary investigation is carried out. If the allegation or concern is against a Designated Safeguarding Officer, it should be reported directly to the Lead Designated Safeguarding Officer.

If the allegation or concern is against the LDSO, it should be reported to Grey Seal Academy's Managing Director. Where there is a complaint against a member of staff there may also be criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services. Actions should be taken both to protect the learner/colleague and the accused member of staff. These may include ensuring that the member of staff is not placed in a vulnerable situation while investigations take place.

## Actions may include:

- o Giving the staff member leave of absence on full pay
- Suspending them
- o Ensuring that they are not working alone with learners

#### **Information Sharing**

Grey Seal Academy is committed to sharing information for the purposes of safeguarding and promoting the welfare of children and young people in line with Working Together (2016) and with respect for The Data Protection Act (2018). Any decision to break confidentiality should always be preceded by informing the learner of what is about to happen and the reason for the decision. There will be no breach of confidence if the person to whom a duty of confidence is owed consents to the disclosure. Staff should, in the first instance, seek the consent from the learner if considering sharing information with other agencies. It is therefore essential that members of staff understand what is meant by the above and for that reason do not promise absolute confidentiality to the learner.





## **Confidentiality Agreement**

Grey Seal Academy will operate on the premise that all information imparted to a member of staff will be treated in confidence. Confidentiality is a key issue in the lives of learners/colleagues. They may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must become familiar with Grey Seal Academy confidentiality guidelines. Staff must not make promises on confidentiality they may be unable to keep.

Furthermore, staff should always make a learner/colleague fully aware of any situation where confidentiality must not be maintained as in a case of child and vulnerable adult protection. Learners/colleagues may disclose information that is difficult for the member of staff to deal with without further advice/support. In this case the learner/colleagues should be told that the situation will be discussed with another colleague with a specialty in that area, but confidentiality will be maintained if possible.

#### How to handle a disclosure

If someone informs you directly that they are concerned about an individual's behavior towards them; this is known as a disclosure.

# The person receiving the disclosure should:

- o React calmly so as not to frighten the learner/colleague
- o Tell the learner/colleague that he or she is not to blame and that he or she was right to tell
- o Take what the learner/colleague says seriously
- o If the learner/colleague is in immediate risk of significant harm telephone for an ambulance and Police inform them of concerns and ensure that they are aware that this is a safeguarding issue
- o Ensure the immediate safety of the learner/colleague
- Avoid leading the learner/colleague and keep any questions to the absolute minimum. Ask only
  what is necessary to ensure a clear understanding of what has been said, seen or heard
- Re-assure the learner/colleague but do not make promises of confidentiality or outcome, which
  might not be feasible in the light of subsequent developments.
- You must tell the learner/colleague you will have to inform your Lead Designated Safeguarding Officer
- Contact the Grey Seal Academy Designated Safeguarding Officer (LDSO)
- LDSO to contact Local Child Social Care Duty team or Designated Officer of Local Authority immediately if safety/ welfare concern, refer all concerns/ allegations/disclosures that may or do constitute a criminal offence to the Police
- If applicable, parents/carers will need to be informed as soon as possible but this must be from an appropriate source (children's social care/police)
- Lead Designated Safeguarding Officer (LDSO), to inform Local Public Protection Unit/Designated Officer and all internal stakeholders.
- Inform Learner's Line Manager (employer)

# If you receive a disclosure or need to record a concern remember to always include the following:

- Names of all involved, date, time, and venue/location record the conversation/observations as accurately as possible using the Learner/Colleague Incident Report Form
- Person to scan and email completed handwritten Learner/Colleague Incident Report' to LDSO.
   LDSO to update with action taken on the same day as the incident/concern.
- LDSO to record summary of incident/ concern on 'Issue Log'. LDSO to ensure reports are stored in line with the Data Protection Act (1998) and GDPR policy





## **IT & Systems**

Grey Seal Academy IT policy aims to safeguard all colleagues operating on our internal networks against the risks associated with radicalisation and safeguarding in general, this further extends to Grey Seal Academy colleagues conduct in using our IT systems. Grey Seal Academy firewalls, anti-virus software and profile control, ensure no unauthorised or unsafe software may be downloaded that may breach our Safe Use of IT policy.

Grey Seal Academy employed a Managed IT Support Service which operates additional security software on emails. This ensures no unsafe emails are allowed to pass into our systems that may yield risks from such as Malware, Spyware and other types of risk that ensures sensitive information such as Learner information is secured.

## **Lone Working**

Where the conditions of service delivery or its associated tasks require Grey Seal Academy staff to work alone, both the individual staff member and their Line Manager have a duty to assess and reduce the risks which lone working presents.

Lone working refers to situations where staff in the course of their duties work alone or are physically isolated from colleagues and without access to immediate assistance. This last situation may also arise where there are other staff in the building but the nature of the building itself may essentially create isolated areas.

Grey Seal Academy has implemented a Lone Working Policy which all existing and new colleagues receive training on, as part of Grey Seal Academy's induction and CPD activity.

## **Out of Hours Contact**

Grey Seal Academy recognises that safeguarding DSO support could be required during out of office hours (9am- 5.30pm). Should a colleague or learner require safeguarding support and guidance, please contact our LDSO on 07477 808337 or MD 07463 803297.

The safeguarding support number will always be turned on and is managed between the Designated Safeguarding Officers, ensuring support is always accessible.

#### **Social Media**

Grey Seal Academy uses social media in our work and we recognise that colleagues, learners and partners who are involved have a responsibility towards the using and monitoring of use of Grey Seal Academy' social media platforms. Social media is intended to be used as effective information, advice and guidance resource, further enabling our learner's development in their personal development, behavior and welfare.

Strict monitoring of social media activity is part of all colleagues' responsibility. Any content which raises a safeguarding concern must be reported to the lead Designated Safeguarding Officer in line with the reporting processes on the previous pages.

## **Monitoring & Review**

The (LDSO) is responsible for implementing and monitoring the Apprenticeships Safeguarding Policy. The number of learner/ colleague protection cases will be reviewed annually by the LDSO. Reports from monitoring and review activities will be reviewed by the LDSO and presented to Grey Seal Academy's, Senior Leadership Team and Managing Director on an annual basis

This Policy will be reviewed annually by Grey Seal Academy's LDSO. All review changes will be approved by the Senior Management Team and Managing Director or within four weeks of a review of any serious learner/colleague protection incident.





# Access to policy documentation, advice and support

This Policy is made available to all delivery staff in formats appropriate to the various audiences, in Quality Operations Manuals and on public drives/intranets.

# Children in Need and Specific Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues and Grey Seal Academy Designated Safeguarding Officers will liaise with appropriate external agencies. Issues that may arise that Grey Seal Academy staff should be aware of and look out for are:

- o Mental Health Problems
- o Domestic Violence
- o Long Term Absence (Fabricated or induced illness)
- o Faith Abuse
- o Gangs and Youth Violence
- o Gender Based Violence Including Violence Against Women and Girls (VAWG)
- o Bullying (including Cyberbullying)
- o Female Genital Mutilation (FGM)
- o E-Safety
- o Child Sex Exploitation (CSE)
- o Forced Marriage
- o Teenage Pregnancy
- o Teenage Relationship Abuse
- o Self-Harm or Suicidal Thoughts
- o Radicalisation, Extremism and Terrorism
- o Risk Taking Behaviour
- o Drug or Alcohol Abuse
- o Sexting
- o Trafficking, Exploitation and Modern Slavery
- o Living with a family member's addiction to Drugs, Alcohol or behaviour such as gambling.

# Person has a concern about a child's safety & welfare

Stay calm

Person to record incident/concern on the 'Learner/Colleague Incident Report' as soon as possible.

Discuss concerns with your Lead Designated Safeguarding Officer (LDSO)or alternative safeguarding contact.

LDSO – if you are still unsure contact the NSPCC for guidance on 0808 800 5000.

LDSO to determine appropriate course of action. (Please note, Person should move directly to orange box in the event of immediate risk!)

# No longer has safety or welfare concerns

Inform Learners / Colleague Line Manager (Employer)

Person to scan and email completed handwritten 'Learner/ Colleague Incident Report' to DSO and LDSO within 2 working days.

LDSO records summary of incident /concern on 'Issue Log'. No

further action required.

# Still has concerns

LDSO to contact the relevant Child Social Care Duty Team immediately if Safety / welfare concern.

Refer all concerns / allegations / disclosures that may or do constitute a criminal offence to the Police.

LDSO informs the relevant Designated Officer (DO). Inform Learner's / Colleagues Line Manager (employer, parents and / or carers).

Person to scan and email completed handwritten 'Learner / Colleague Incident Report' to LDSO, this must happen on the same day as the Incident / concern is reported. LDSO records summary of incident and all stakeholders are to be updated.

contact the 'Speak Up' line on 0808 234 7881 (UK) OR 01800 558 632 (ROI)

Immediate risk of significant harm

Person must dial 999, requesting medical and Police assistance

Inform Grey Seal Academy LDSO as soon as possible. Inform Learner's / Colleague Line Manager (employer, parent or carer).

Person to scan and email completed handwritten 'Learner/ Colleague Incident Report' to LDSO, this must happen on the same day as the incident / concern is reported LDSO records summary of incident/concern on IssueLog and all stakeholders are to be updated.

The matter will then be managed by the appropriate agencies

## Person has a concern about an Adult as Risk

# Stay calm

Person to record incident/concern on the 'Learner/Colleague Incident Report' as soon as possible

Discuss concerns with your Lead Designated Safeguarding Officer (LDSO)or alternative safeguarding contact\*

LDSO to determine appropriate course of action. Please note, Person should move directly to orange box in the event of immediate risk!

# No longer has safety or welfare concerns

Inform Learners/Colleague Line Manager (Employer)

Person to scan and email completed handwritten 'Learner/ Colleague Incident Report' to LDSO within 2 working days.

LDSO records summary of incident / concern on 'Issue Log' and all internal stakeholders are updated.

No further action required

#### Still has concerns

LDSO to contact the relevant Child Social Care Duty Team immediately if safety / welfare concern.

Refer all concerns / allegations / disclosures that may or do constitute a criminal offence to the Police.

LDSO informs the MD

Person to scan and email completed handwritten 'Learner/ Colleague Incident Report' to LDSO, this must happen on the same day as the incident/concern is reported.

LDSO records summary of incident

/ concern on 'Issue Log'. All stakeholders are to be updated.

Please note if you are unable to contact your LDSO, please contact the 'Speak Up' line on 08082347881 (UK)OR01800 558 632 (ROI)

Immediate risk of significant harm

Person must dial 999, requesting medical and Police assistance

Inform Grey Seal Academy LDSO assoonaspossible. Inform Learner's / Colleague Line Manager (employer, parent or carer).

Person to scan and email completed handwritten 'Learner/ Colleague Incident Report' to LDSO, this must happen on the same day as the incident / concern is reported LDSO records summary of incident / concern on Issue Log and all stakeholders are to be updated.

The matter will then be managed by the appropriate agencies

# **Designated Safeguarding Officers**

Grey Seal Academy Designated Safeguarding Officers are responsible for acting as a source of advice and support in relation to safeguarding and protecting learners, promoting good practice and for coordinating action within the company on receipt of any concerns or referrals. The Lead DSOhas governance over safeguarding matters across Grey Seal Academy and Grey Seal Academy's Managing Director has overall responsibility for safeguarding at strategic level.

Name	Contract/Area	Email	Telephone
Andrew Barnard	National	andy.barnard@greysealacademy.co.uk	07477 808337
Annette Hall	National	annette@greysealacademy.co.uk	07463 803297

Person has a Prevent Duty concern (see below)

# Person has a Prevent Duty concern

# Stay calm

Once a learner/colleague cause for concern has been identified, contact and report concern to your lead safeguarding officer or alternative safeguarding contact.

LDSO gathers more information.

# No longer has safety / welfare concerns

Inform Learners/Colleague Line Manager (Employer)

Person to scan and email completed handwritten 'Learner/ Colleague Incident Report' to LDSO within 2 working days.

LDSOrecordssummaryof incident /concern on 'Issue Log' and all internal stakeholders are

No further action required.

updated.

# Still has concerns

LDSO to contact the local Prevent police/local authority officer.

Refer all concerns/allegations/ disclosures that may or do constitute radicalisation and extremism behaviour and/or criminal offence to the Police.

LDSO informs / liaises the relevant PPU Designated Officer (DO) / Channel Coordinator keeping internal stakeholders updated.

Inform Learner's / Colleagues Line Manager (employer and parent / carers if applicable).

Persontoscan and email completed handwritten 'Learner / Colleague Incident Report' to LDSO, this must happen on the same day as the incident / concern is reported.

LDSO records summary of incident / concern on 'Issue Log'. All internal stakeholders to be updated.

If unable to contact LDSO
Please phone the anti-terrorist
hotline on 0800 789321

Immediate risk of significant harm

Person must dial 999, requesting medical and Police assistance

Inform Grey Seal Academy LDSO as soon as possible. Inform Learner's / Colleague Line Manager (employer, parent or carer).

Person to scan and email completed handwritten 'Learner /Colleague Incident Report' to LDSO, this must happen on the same day as the incident / concern is reported. All internal stakeholders to be updated.

The matter will then be managed by the appropriate agencies

# Grey Seal Academy Safeguarding Referral Form



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Reporting		Contact Number				
Member of Staff						
Learner Name		Course				
Date of Birth						
Address		Contact				
		Number(s)				
Record/Report						
	s of concerns identified or d	lisclosure that has been made				
odoo provido dotaii	Please provide details of concerns identified or disclosure that has been made.					
Details of Actions the	nat you have taken (to dat	e)				
Further Information						
i.e. what information have you given to the learner? Is the learner working with any agencies?						
	-					
Signature of		Date of Submission				
Reporting		(Notify safeguarding officer)				
Member of Staff		(11111) 11111 2111 4111 2111 2111				

It is important that you complete all sections of the form. Once completed, please forward the form for the attention of the Lead Designated Safeguarding Officer via email and your form will be dealt with accordingly. Please note that the LDSO will acknowledge receipt of your concern and will keep you informed of actions being taken wherever possible.

## **Policy Details; Definitions**

## A child or young person

The legislation specifically refers to any person who is under the age of 18 years.

# Adult at Risk aged 18 or over

An adult at risk is defined by the Care and Support Statutory Guidance 2015 (issued under The Care Act 2014):

- o Who is or may be in need of community care services by reason of mental or other disability, age or illness?
- o Who is or may be unable to take care of him or herself or unable to protect him or herself against significant harm or serious exploitation?

## Categories of adults at risk of abuse, includes:

- o Physical abuse
- o Domestic abuse
- o Sexual abuse
- o Psychological abuse
- o Financial or material abuse
- o Organisational abuse
- o Modern slavery
- o Neglect or acts of omissions
- o Discriminatory abuse
- o Self-neglect

A person's vulnerability will depend on their circumstances and environment, and each case must be considered individually.

### Note:

However, that people are not vulnerable adults just because of any learning difficulty or learning disability. They will be defined as vulnerable adults when they receive health, social care or other services, or activities specifically for those with learning difficulties and/or disabilities.

#### **Significant Harm**

Significant harm is the threshold that provides for intervention by other agencies.

#### **British Values**

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"; institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010.

### Extremism

The government has defined extremism in the Prevent Duty 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."

This also includes calls for the death of members of the British armed forces.

Values	Principles or standards of behaviours; one's judgement of what is important in life.	
Terrorism	Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.	
Radicalisation	The process by which a person comes to support terrorism and forms of extremism leading to terrorism.	
ldeology	An ideology is a set of beliefs	
Citizen	A legally recognised subject or national of a state or commonwealth, either native or naturalised.	
Citizen Education	Enables people to learn about their rights and responsibilities, and to understand how society works. It prepares them for dealing with the challenges they face in life. Through citizenship education, young people are encouraged to play an active part in the democratic process, thereby becoming more effective members of society. Effective citizenship education increases confidence, self-esteem and motivation for learning.	
Religion	Religion can be explained as a set of beliefs concerning the cause, nature, and purpose of the universe, especially when considered as the creation of a superhuman agency or agencies, usually involving devotional and ritual observances, and often containing a moral code governing the conduct of human affairs.	
Belief	Indicates an acceptance that something exists or is true, especially one without proof, and represents trust, faith, or confidence in (someone or something).	
Faith	Indicates strong belief in the doctrines of a religion, based on spiritual conviction rather than proof.	
Democracy	The term democracy is a Greek word which means 'Government by the people' and this entitles citizens of the UK (minus a few exceptions) to have the right to vote if you are aged 18 or over.	

## **Child Exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or a young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sexual abuse, child sexual exploitation:

- o Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year-olds who can legally consent to have sex;
- o Can still be abuse even if the sexual activity appears consensual;
- o Can include both contact (penetrative and non-penetrative acts) and non- contact sexual activity;
- o Can take place in person or via technology, or a combination of both
- o Can involve force and / or enticement- based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- May occur without child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example)
- o Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time;
- o Is typified by some form of power imbalance in favor of those perpetrating the abuse. This power imbalance can include gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

# What is meant by Abuse/ Neglect?

Neglect is the persistent failure to meet a young person's or vulnerable adult's basic physical and / or psychological needs, likely to result in the serious impairment of their health or development. This includes cold, starvation or any aspect of care which could result in significant impairment of an individual's well-being or development.

## For example:

- o Failure to keep a person clean, warm and healthy
- o Failure to provide reasonable care
- o Failure to give prescribed medication
- o Failure to provide adequate supervision
- Failure to give privacy and dignity of care
- o Failure to give access to appropriate medical care
- o Failure to provide nourishment

## Note:

This is not an exhaustive list but guidance as to what may suggest abuse. The Police and Social Services have prime responsibility under the Children's Act 2004 and this places the duty of care on local authorities to take action to protect vulnerable persons in particular circumstances and it gives powers to the police enabling them to take action to protect. Other examples include failing to protect from physical harm or failure to provide appropriate medical care.

# **Physical Abuse:**

Physical injury or unreasonable physical constraint to an individual where there is definite knowledge or reasonable suspicion that the injury was inflicted or knowingly not prevented.

# For example:

- o Assault
- Slapping, scratching, hitting, burning/ scalding
- o Misuse of medication, deliberate poisoning
- o Suffocation, pushing, rough handling.
- o Shaking, force feeding and unnecessary restraint
- o Potential indicators of physical abuse may include:
- o Sprains, fractures, broken bones and burns
- o Rope or strap marks
- o Bruises of different colors suggesting they were sustained over a period of time
- o Hair and tooth loss
- o Internal injuries
- o Bleeding from bodily orifices
- o Delay between on the onset injury and seeking medical care.

### Financial/Material Abuse

Misappropriation of an individual's funds, and/or any other actions that are against their best interests.

## For example:

- o Theft of money, possessions, property or other material goods
- o Misuse of money
- o Fraud or extortion of material assets
- o Disparity between a person's living conditions and their financial resources
- o Unusual and extraordinary interest and involvement by a third party in the vulnerable individuals assets
- o Pressure in connection with wills

## Psychological/Emotional Abuse

Actions that are not of a physical nature but severely affect the psychological well-being of the individual for example conveying to them that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of the other person. Some level of emotional abuse is involved in all types of ill treatment of a young person or vulnerable adult, although it may also occur alone.

## Other examples include:

- o Humiliation or ridicule.
- o Deliberately ignoring an individual.
- o Threat or punishment or exclusion.
- o Verbal assault including bullying

# Potential indicators of psychological / emotional abuse include:

- o Stress related conditions, including raised blood pressure
- o Significant weight gain or loss not attribute to other causes
- o Low self esteem
- o Isolation
- o Problems sleeping
- o Depression or confusion
- o Cowering in presence of abuser
- o Non-responsive, upset or agitated

Where young learners or adults are working in a class/group, colleagues are charged with monitoring learners' behavior and are asked to act promptly on any suspicion or report of bullying or harassment.

#### **Sexual Abuse:**

Sexual abuse involves forcing or enticing a young person or vulnerable adult to take part in sexual activities to which they may not have given consent or may not fully comprehend. The activities may involve physical contact or non-penetrative acts including non-contact activities such as the production of pornographic material or watching sexual activities or encouraging a young person or vulnerable adult to behave in a sexually inappropriate way.

## For example:

Indecent exposure, rape, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or pressured into consenting.

## **Discriminatory Abuse:**

Is abuse that may take the form of slurs, harassment and maltreatment because of someone's race, gender, disability, age, faith, culture or sexual orientation.

It may also involve providing different care or support to a vulnerable adult based on any difference or disability they may have. The individual may be subject to actions or threats which result in harm or them feeling frightened.

## Potential indicators of discriminatory abuse may include:

- o Tendency to withdrawal, isolation or depression.
- o Fearfulness
- o Being used as a scapegoat
- o Being refused access to services or being excluded inappropriately by others
- o Loss of self-esteem
- o Resistance or refusal to access services that are required to meet the vulnerable individuals needs
- o Expressions of anger or frustration by victim
- o Weight loss

# **Modern Slavery:**

Slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

# Cyberbullying

Cyber bullying is bullying that takes place by one person or a group of people using electronic technology. Electronic technology includes devices and equipment such as mobile phones, computers, and android and tablet devices. Additionally, communication tools including social media sites, text messages, social chat applications and websites.

# For example:

- o Threatening, teasing or embarrassing text messages
- o Rumor spreading sent by email or posted on social media networking sites
- o Uploading and posting embarrassing pictures and videos
- o Creation of fake profiles

## Potential indicators of cyberbullying may include:

- o Use of alcohol and drugs
- o Fearfulness
- o Experiencing in-person bullying
- o Be unwilling to attend appointments or planned activity
- o Loss of self-esteem
- o Expressions and anger or frustration by victim
- o Problems sleeping

## Institutional/Organisational Abuse

May take the form of systems and routines that neglect or prevent an individual receiving appropriate care. The convenience and needs of the staff are prioritised above those of the vulnerable individual.

Poor services are either promoted or ignored. This can happen in any setting where formal care is provided.

## Potential indicators of institutional abuse may include:

- o Lack of person-centered care planning or a ritualised care routine
- o No flexibility in bedtime routine and / or deliberate waking
- o People left on the commode or toilet for long periods of time
- o Inappropriate care of possessions, clothing and living area
- o Lack of personal clothes and belongings
- o Inappropriate use of medical procedures
- o People referred to or spoken to with disrespect
- o Lack of choice in food or menus or menu planning
- o Inappropriate use of power or control

# Statutory requirements summary further advice and information

- o The Care Act 2014
- o Children (Protection at Work) (No2) Regulations 2000
- o Children's' Act 1989 (Amendment Act 2004)
- o Counter-Terrorism & Security Act 2015
- o Data Protection Act 1988
- o Education Act 1996 (Amendment Act 2002)
- o Education and Inspections Act 2006
- o Employment Act 2002
- o Equality Act 2010
- o Employment Rights Act 1996
- o Freedom of Information Act 2000
- o Further Education and Training Act 2017
- o Human Rights Act 1998
- o Learning and Skills Act 2000
- o Protection from Harassment Act 1997
- o Safeguarding Vulnerable Groups Act 2006
- o Special Educational Needs and Disability Act 2001 (SENDA)
- o Working Together to Safeguard Children (2016)