



## SAFEGUARDING POLICY

This policy outlines the framework and procedures to be carried out to safeguard young people, vulnerable adults and those at risk of radicalisation at City of Westminster College

<b>Policy owner:</b>	Head of Learner Services
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## 1. Background

1.1 The Department of Education published an updated version of *“Keeping children safe in education” Statutory guidance for schools and colleges*. This guidance was published in May 2016 and is effective from Sept 2016. This document contains information on what schools and colleges should do and sets out the legal duties with which schools and colleges must comply. The guidance stresses the need for effective and timely multi- agency action which promotes the best interest of the child. The guidance should be read alongside Working Together to Safeguard Children (March 2015).

1.2 The revised guidelines make reference to *“Safeguarding and promoting welfare of children.”* Safeguarding and promoting the welfare of children is defined as *“protecting children from mal-treatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes”*

The guidance states *“Where a child is suffering significant harm, or is likely to do so, action should be taken to protect the child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk”*

1.3 Legislation that underpins *“Keeping children safe in education” Statutory guidance for schools and colleges* that applies directly to education includes:

- The Rehabilitation of Offenders Act 1974
- The Children Act 1989 and 2004
- The Education Act 2002
- The Further Education (Providers of Education) regulations 2006
- Safeguarding Vulnerable Groups Act 2006
- The Equality Act 2010
- The Protection of Freedoms Act 2012
- Children and Families Act 2014
- Counter Terrorism and Security Act 2015
- Female Genital Mutilation Act 2003 (Serious Crime Act 2015)

1.4 In 2014 the Government passed the Care Act. In the context of the legislation, specific adult safeguarding duties apply to an adult who:

- has care and support needs and
- is experiencing, or is at risk of, abuse or neglect and
- is unable to protect themselves because of their care and support needs

The Care Act 2014 explicitly requires local authorities to work with partner organisations, to actively promote people’s independence and well-being, not just to respond to crises when they occur. People with care and support needs are not inherently vulnerable, but they may come to be at risk of abuse or neglect at any point due to:

- Physical or mental ill health
- Becoming disabled
- Getting older
- Not having support networks
- Inappropriate accommodation
- Financial circumstances
- Being socially isolated

Legislation and Guidance which underpins safeguarding of vulnerable adults includes:

- Health Act (1999) includes provision for the protection of vulnerable adults
- No Secrets (2000)
- Care Standards Act (2000)
- Sexual Offences Act (2003)
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act (2006)
- Care Act 2014
- Children and Families Act 2014
  - *Prevent* Duty Guidance (2015)

1.5 The purpose of the Safeguarding Vulnerable Groups Act (2006) as amended by the Protection of Freedoms Act 2012 is to restrict contact between children and vulnerable adults and those who might do them harm. The level of DBS check required and whether a prohibition check is required will depend on the roles and duties of staff in an institution.

1.6 The Counter-Terrorism and Security Act (2015) places a public sector duty on Colleges to have due regard to the need to prevent people from being drawn into terrorism. The *Prevent*-related responsibilities includes helping prevent people being drawn into terrorism. This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

1.7 Section 5B of the Female genital mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty on teachers along with other professionals, where they discover (either through disclosure by the victim or through visual evidence) that FGM appears to have been carried out on a girl under 18.

1.8 All educational establishments and local authorities are subject to inspection by Ofsted, and/or other relevant inspectorates. The organisation's performance in regard to their responsibility to safeguard and promote the welfare of children (and vulnerable adults) in accordance with the relevant legislation and guidance will form part of the inspectorate's judgement of the organisation or establishment's overall performance. Performance in this area will be judged by not only the existence of procedures but also by the organisation's effectiveness in terms of safeguarding children and vulnerable adults from harm.

## 2. Key Definitions

2.1 **Children** - Children includes everyone under the age of 18

### 2.2 **Adults with Care and Support Needs**

An adult with care and support needs may be:

- an older person
- a person with a physical disability, a learning disability or a sensory impairment
- someone with mental health needs, including dementia or a personality disorder
- a person with a long-term health condition
- someone who misuses substances or alcohol to the extent that it affects their ability to manage day to day living
- victims of sexual exploitation

2.3 **Vulnerable Adult** - Current NHS definition of a Vulnerable Adult is:

A vulnerable adult is aged 18 or over, receives or may need community care services because of a disability, age or illness, and who is or may be unable to take care of themselves or protect themselves against significant harm or exploitation.

**From September 2012, a vulnerable adult** is defined by the Protection of Freedoms Act 2012 as a person aged 18 or over who is in receipt of **regulated activity**. This definition informs the level of DBS check required of people who provide support for adults.

### 2.4 **Regulated Activity (applies to children and vulnerable adults)**

The term **Regulated Activity** is a statutory term used to describe working or volunteering with children or vulnerable adults. Regulated activity covers anyone working closely with children or vulnerable adults, either paid or unpaid, not part of a family or personal arrangement, on a frequent, intensive or overnight basis.

**Frequent** means once a week or more (except in health or personal care services where frequent means once a month or more); **intensive** means four times in a month or overnight.

See Appendix 1 for more information on Regulated Activities

### 2.5 **Terrorism**

Defined in the Act as 'The use or threat of action designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public; made for the purposes of advancing a political, religious, racial or ideological cause'

### 2.6 **Extremism**

Defined 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’

## 2.7 **Radicalisation**

Defined as ‘the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups’.

## 3. **Definitions of Abuse and Neglect of Children** (taken from Working Together to Safeguard Children 2015)

### 3.1 **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocation or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of or deliberately causes ill health to a child whom they are looking after.

### 3.2 **Emotional Abuse**

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, although it may occur alone. Types of emotional abuse include:

**Bullying:** Bullying is the oppression or persecution of a weaker person by a stronger person. It is sometimes included as a type of child abuse. The difference is that bullying is often inflicted by a peer rather than by an adult. However adults and older children are capable of bullying behaviour and it is frequently an element of all types of child abuse.

**Cyberbullying:** Cyberbullying is the use of Information Communications Technology (ICT), particularly mobile phones and the internet, deliberately to upset someone. It is different from other forms of bullying because: it can take place at any time and can intrude into spaces that have previously been regarded as safe or personal; the audience can be very large and reached rapidly. Cyberbullying can take place between peers and across generations and some instances of cyberbullying are known to be unintentional.

**Sexting:** Sexting is when someone sends or receives a sexually explicit text, image or video on their mobile phone, usually in a text message.

### 3.3 **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is fully aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. This may include non-contact activities, such as involving children in looking at or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. **Grooming** is the term used to describe how an adult gets to know a child gradually and in quite natural ways, with the intention of sexually abusing and /or exploiting them. With increased internet usage more children are being targeted for this form of abuse.

### 3.4 **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food or shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.

In addition to the categories of abuse listed, the revised guidance has identified the following as specific safeguarding issues:

- Child sexual exploitation (CSE)
- Domestic violence
- Forced marriage
- Bullying (including cyber- bullying)
- FGM
- Drugs
- Fabricated or induced illnesses
- Faith abuse
- Teenage relationship abuse
- Gangs and youth violence
- Gender based violence/ violence against women and girls
- Mental health
- Private fostering
- Preventing radicalisation
- Trafficking
- Child missing from home or care
- Child missing from education

See Appendix 2 for additional information and guidance on specific safeguarding concerns

### 3.5 **Abuse of position of trust**

Under the Sexual Offences Act 2003 it is an offence for a person over 18 e.g. teacher, to have a sexual relationship with a young person under 18 where that

person is in a 'position of trust' in respect of the young person, even if the relationship is consensual.

#### 4. **Vulnerable Adults – descriptions and categories of abuse (identified in Care and support statutory guidance 2015)**

4.1 **Physical Abuse:** This includes hitting, slapping, pushing, kicking, rough handling or unnecessary physical force either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions.

4.2 **Sexual Abuse:** This includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting. Sexual abuse can occur between people of the same sex and it can also occur within a marriage or any long-term relationship. A relationship of trust should exist between a member of staff or a volunteer and the person for whom they are caring, it would be seen as a betrayal of that trust, and therefore abusive, for that member of staff or volunteer to have a sexual relationship with the person they are caring for. **Vulnerable adults are susceptible to grooming**, see 3.3 for definition

4.2(I) **Sexual Exploitation:** Sexual exploitation is the sexual abuse of children and vulnerable adults through the exchange of sex or sexual acts for drugs, food, shelter, protection, other basics of life, and/or money. Sexual exploitation includes involving children and vulnerable adults in creating pornography and sexually explicit websites.

4.3 **Psychological Abuse:** This includes emotional abuse, threats of abandonment or harm, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

4.4 **Financial or Material Abuse:** This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation.

4.5 **Neglect and Acts of Omission:** This includes ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating.

4.6 **Discriminatory Abuse:** including forms of : harassment, slurs or similar treatment because of :

- Race
- Gender and gender identity
- Age
- Disability
- Sexual orientation
- Religion

4.7 **Organisational Abuse:** This is the mistreatment of a vulnerable adult by a regime or individuals in an institution. It can be through repeated acts of poor or inadequate care and neglect, or poor professional practice.

4.8 **Domestic Violence and Abuse:** an 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. The abuse can encompass, but is not limited to:

- Psychological
- Sexual
- Financial
- Emotional
- physical

4.9 **Modern slavery:** includes slavery, human trafficking, forced labour and domestic servitude, traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

See Appendix 3 for Indicators of Abuse

See Appendix 4 for Additional Information on Cyberbullying

## **5. Prevent – related responsibilities**

### **5.1 Partnership**

The College will actively engage with governors, members of staff, students and other partners (including the police and *Prevent* Co-ordinators) to implement best practice in supporting students. Our aim is to prevent students from being radicalised and drawn into extremism, which terrorist organisations may exploit /or being exploited by terrorist organisations.

### **5.2 Risk assessment**

The College will carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism. The College will review its policies and procedures, in response to identified risks. The College will prioritise reviewing the policies and procedures for events held by staff, students or visitors and relationships with external bodies who may use College premises or work in partnership with the institution. Key risks and control measures will be reflected in the College's Risk Register.

### **5.3 Action Plan**

The College will inform the local Prevent co-ordinator of any identified risks and the action it plans to take to mitigate the risks.

### **5.4 Staff training**

The College will demonstrate that governors, managers, teachers and support staff undertake appropriate training and are able to identify students who may be vulnerable to being drawn into extremism and possibly terrorism. Training for teachers and staff involved in supporting learning will include the importance of exemplifying British values and reinforcing the importance of respecting other people with particular regard to the protected characteristics set out in the Equalities Act 2010. Procedures for sharing concerns and referrals to Channel programmes will be incorporated into the training.

### **5.5 Welfare and pastoral care**

All members of the College community will be reminded of their responsibility to safeguarding students (through face to face training, Information leaflets and Staff bulletin items). The College will review how the multi-faith room is used and the mechanism for managing any issues that may arise from the use of the facility.

### **5.6 IT policies**

The College will review IT policies and procedures to ensure that they make reference to the Prevent duty guidance.

## 6. Policy

This policy represents City of Westminster College's response to its role in safeguarding the welfare of students and other young people under 18 and vulnerable adults.

- 6.1 The College will set up clear procedures with designated members of staff in charge of these procedures within the college (Appendix 1A). Each campus will have a Nominated Link Person who will ensure the procedures are followed.
- 6.2 The College will ensure the student's wishes or feelings are taken into account when determining what action to take and what services to provide to protect them. This will be done by ensuring the student has the opportunity to speak to a member of staff who is involved in making decisions about action which may happen.
- 6.3 The College will work co-operatively with external agencies such as the police, Prevent Co-ordinators and Social Services.
- 6.4 The College will ensure that young people are offered the support they require through the tutorial programme and Student Advice service. Resources are made available to tutors to use at induction and during the year. The Student Advisors support students who have been victims of bullying through short term counselling and referral to outside agencies if necessary.
- 6.5 The staff of the college will work towards ensuring the curriculum offers information and support for issues of safeguarding.
- 6.6 Staff managing school link and franchised provision will ensure that information relating to schools' child protection procedures are documented. The College and the Designated Teacher for Child Protection in the Link School / franchised provision must share information concerning a School Link student on a school roll. If a referral is made to Social Services by the College, the Designated Teacher in the Link School must be informed.
- 6.7 The College will ensure that all staff and governors, as part of staff development (including staff working for contracted out services) receive appropriate training to ensure that they are able to recognise the signs and symptoms of abuse. In addition all staff will be made fully aware of the procedures for reporting and recording their concerns. The College will deliver training on radicalisation and the action that must be taken if there is a concern that a member of the College community may be drawn into terrorism
- 6.8 The College will monitor and review annually the Safeguarding Policy and Procedures as part of its equality initiatives.
- 6.9 The College will ensure that all recruitment checks, as outlined in *Keeping children safe in education (September 2016)* are carried out.

- 6.10 The College will recommend and disseminate its “Code of Conduct” for staff working with young people and vulnerable adults for all staff as outlined in guidance published by Government Offices for the English region.

## **7. Procedures**

- 7.1 Each campus within the college will have a Nominated Link Person. In the first instance this will be the Student Advisor. The Head of School ALS will be the nominated person with regard to learners with Additional Support Needs and The Head of School (SLDD) will be the nominated Link person for students on discrete programmes. The Head of Learner Services shall be the College's "Designated Senior Person".
- 7.2 Looked after Children: Students will be given the opportunity to declare their Looked After/Care Leaver status at all stages of the recruitment and enrolment process; during induction and while on course. Additional support will be offered to students who fall into these categories by the Careers and Student Advice teams. The Head of Learner Services shall be the College's "Designated Teacher" for Looked After children
- 7.3 Missing Children: In the case of missing children the college will work with statutory agencies to ensure the safety of the missing child. In the case of students with high needs in Disability School staff will follow Local Authority guidelines on reporting of absences.
- 7.4 Students on Work Experience: The College will have policies and procedures in place to protect students from harm when they are on work placement.
- 7.5 A Safeguarding Group will consist of the Nominated Link Persons from each Faculty (i.e. the Student Advisers), HoS School (ALS), Head of School (SLDD), Head of Teaching and Training, Head of Learner Services, H.R. Manager, and the Vice Principal.. The Designated Senior person will convene the group termly.
- 7.6 A named governor will be responsible for overseeing this policy and related procedures and to liaise with partner agencies in the event of allegations of abuse being made against the Principal.
- 7.7 If a young person or vulnerable adult discloses abuse to any member of staff details of the disclosure must be recorded on the *Safeguarding Concern Form* (Appendix 6) and the member of staff must refer the student to the Student Adviser or nominated person. This also includes situations of abuse which may involve staff members. If the Student Advisor is not available colleagues must refer the student to the Designated Senior Person (Head of Learner Services) or in their absence Vice Principal. (Appendix 5)

- 7.8 The Safeguarding Concern form should also be used to record concerns about a student who may be at risk of radicalisation. The Designated Senior Person will follow the Channel processes within FE Colleges on receipt of a referral. See Appendix 5
- 7.9 Although the revised guidelines highlight that **“if at any point, there is a risk of immediate serious harm to a child a referral should be made to Children’s Social Care immediately. Anybody can make a referral”**. Details of all referrals must be shared with the designated safeguarding team.
- 7.10 If it is deemed necessary for a safeguarding concern involving an SLDD student to be referred to statutory services, the following guidelines must be adhered to:
- If the concern arises out of an incident that occurred at College or while the student is in “the care” of the College, the concern must be reported to Westminster Social Services in the first instance. (Appendix 7)
  - If the concern arises out of an incident that occurred at the student’s home or when they were not at College, the referral must be made to the “home” authority
- 7.11 If any member of staff suspects that a young person or vulnerable adult is being abused they should record their concerns on the *Concern Form* then discuss this in the first instance with a Student Adviser or nominated person within the Faculty.
- 7.12 All complaints, allegations or suspicions must be taken seriously.
- 7.13 Absolute promises of confidentiality should **not** be given as the matter may develop in such a way that these might not be able to be honoured.
- 7.14 If the complaint comes directly from the child/adult, questions should be kept to the minimum necessary to understand what is being alleged and care is taken to avoid leading questions. Unnecessary questioning could jeopardise future legal proceedings.
- 7.15 Issues regarding the safeguarding of young people and vulnerable adults should be included within the tutorial programme.
- 7.16 Safeguarding training is mandatory for all new members of staff, it is covered during induction. All new members of staff are expected to attend a College induction within 3 months of starting work at College.
- 7.17 (1) Mandatory safeguarding training will include information on radicalisation and extremism. Additionally all members of staff will be required to attend a dedicated Workshop to Raise Awareness of Prevent (WRAP) within six months of joining College.

- 7.18 Any concern should be noted on the Safeguarding Concern Form (Appendix 6) and emailed to [safeguarding@cw.ac.uk](mailto:safeguarding@cw.ac.uk) or passed to the Designated Senior Person to be kept in a safe and secure place for a minimum of seven years.
- 7.19 All incidents requiring use of restraint should be reported using the on-line Incident Report form.
- 7.20 Notices will be displayed informing staff of the link person.
- 7.21 Students who are found to have placed other students or staff “At Risk” will face disciplinary action in accordance with Our College Code and Student Disciplinary procedures.

The procedures laid out in this document must be followed whenever an allegation is made that a child/adult has been abused.

## **8. Procedure for Allegations Against Staff**

- 8.1 Allegations of abuse against a member of staff must be referred to the Designated Senior Person as soon as possible and in any case within 2 hours of the initial concern arising. If the nominated member of staff cannot be contacted a member of the Executive team must be contacted. The Principal should be notified and will follow College Disciplinary procedures. The College will inform the Local Authority Designated Officer (LADO) of any allegations that might indicate a person would pose a risk of harm to children.
- 8.2 All allegations and investigations against members of staff will be conducted in line with legislation and good practice outlined in the revised statutory guidance “Keeping children safe in education.”
- 8.3 When conducting an investigation involving a safeguarding issue (where the alleged victim is under 18 or a vulnerable adult) the investigating officer must take guidance from the Designated Senior Person in relation to the interviewing procedure to be followed and where there is significant risk student interviews could be conducted by the Designated Senior Person or the Senior Student Advisor.
- 8.4 The Designated Senior Person may decide to stop proceedings and refer the case to the police for further investigation where this is deemed necessary.
- 8.5 If a member of staff is dismissed or removed from “regulated activity” (or would have been had they not already left) because they harmed or posed a risk of harm to vulnerable groups including children, the College will be under a legal obligation to forward information about that person to the DBS. It is the responsibility of the DBS to make a decision on the barring or not of any individual. The member of staff may make representation to the DBS against being barred.



## **9. Procedure for Monitoring and Reviewing Policy and Procedures**

9.1 The Safeguarding Group will monitor and review their practice termly.

9.2 A formal report will be made annually by the Designated Senior Person to the Principal and Governors on numbers of interventions and, if appropriate, outcomes of any interventions. The report will be limited in its content to ensure the protection of those involved.

### **Related College Policies:**

- Anti-bullying Policy (Students)
- Code of Conduct for Staff
- Staff Disciplinary Policy
- Equal Opportunities Policy
- Trips and Visits Policy
- Student Disciplinary Policy and Procedures

## Information on REGULATED ACTIVITIES

**A Regulated Activity** may be a role that is carried out frequently or intensively or overnight in any of the following **specified** settings:

- Schools (educational institutions exclusively or mainly for the provision of full time education to under-18s)
- Pupil referral units
- Childcare premises (including nurseries)
- Residential homes for children in care
- Children's hospitals (hospitals exclusively or mainly for the reception and treatment of children)
- Children's detention centres (institutions exclusively or mainly for the detention of children)
- Children's centres in England and Wales, and
- Adult care homes (residential care or nursing homes in Northern Ireland).

Regulated activity can also include any of the following specified activities:

- Teaching, provided wholly or mainly for children and vulnerable adults
- Training, provided wholly or mainly for children or vulnerable adults
- Supervising
- Advice
- Treatment, or
- Transport

**To be eligible to request an Enhanced DBS check a position must meet both the definition of the activity and meet the frequency or intensive test.** It cannot be Regulated Activity if it does not meet both conditions.

For DBS purposes a vulnerable adult is a person who is aged 18 years or older and:

- is living in residential accommodation, such as a care home or a residential special school;
- is living in sheltered housing;
- is receiving domiciliary care in his or her own home;
- is receiving any form of health care;
- is detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act 1999;
- is in contact with probation services;
- is receiving a welfare service of a description to be prescribed in regulations;
- is receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions or expectant or nursing mothers living in residential care (age-related needs includes needs associated with frailty, illness, disability or mental capacity);
- is receiving direct payments from a local authority/HSS body in lieu of social care services;
- requires assistance in the conduct of his or her own affairs.

In order for eligibility to exist in this case the role must meet the eligibility criteria for Regulated Activity. This means working in the **same specified place**, working **frequently** (once a week or more) and **having the opportunity to have contact with children or vulnerable adults** or carrying out a **specified activity, frequently**. If this is the case then eligibility would exist.

This list has been taken from “Keeping children safe in education”.

***Specific safeguarding issues***

25. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the [TES website](#) and also on its own website [www.nspcc.org.uk](http://www.nspcc.org.uk). Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- [child sexual exploitation \(CSE\)](#) – see also below
- [bullying including cyberbullying](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#) – see also below
- [forced marriage](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [mental health](#)
- [private fostering](#)
- [radicalisation](#)
- [sexting](#)
- [teenage relationship abuse](#)
- [trafficking](#)

**Key points:**

Domestic violence and abuse: new definition

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. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

### **Controlling behaviour**

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

### **Coercive behaviour**

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

### **Domestic abuse and young people**

The changes to the definition of domestic raise awareness that young people in the 16 to 17 age group can also be victims of domestic violence and abuse.

By including this age group the government hopes to encourage young people to come forward and get the support they need, through a helpline or specialist service.

### **Forced marriage**

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.

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're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

### **Child abuse linked to faith or belief**

Abuse linked to belief, including belief in witchcraft or possession, is a horrific crime which is condemned by people of all cultures, communities and faiths.

Standard child safeguarding procedures apply in all cases where abuse or neglect is suspected, including those that may be related to particular belief systems.

The number of cases of child abuse linked to faith or belief in spirits, possession and witchcraft is believed to be small, but where it occurs it causes much distress and suffering to the child. It is likely that a proportion of this type of abuse remains unreported.

Abuse linked to faith or belief may involve a wider context, where the child is treated as a scapegoat in circumstances of family stress, deprivation, domestic violence, substance abuse and mental health problems.

## **Mental health difficulties can increase a person's vulnerability**

### ***Mental health difficulties – the statistics***

At least one in four people will experience a mental health difficulty at some point in their life and one in six adults has a mental health problem at any one time.

One in ten children aged between 5 and 16 years has a mental health difficulty, and many continue to have mental health difficulties into adulthood.

Half of those with lifetime mental health difficulties first experience symptoms by the age of 14, and three-quarters before their mid-20s.

Self-harming in young people is not uncommon (10–13% of 15–16-year-olds have self-harmed).

Almost half of all adults will experience at least one episode of depression during their lifetime.

One in ten new mothers experiences postnatal depression.

About one in 100 people has a severe mental health difficulty.

Some 60% of adults living in hostels have a personality disorder.

Some 90% of all prisoners are estimated to have a diagnosable mental health difficulty (including personality disorder) and/or a substance misuse problem.

**Child sexual exploitation (CSE)** involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship.

The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

**Female Genital Mutilation (FGM):** professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### **Possible indicators of abuse of teenagers**

It can be harder to spot signs of abuse in teenagers than in younger children or vulnerable adults as teenagers are more capable of covering up injuries; however it is important that staff are aware of changes in a learner's behaviour, attendance or attitude to their work as the changes could be indicators of abuse.

Possible indicators of abuse in teenagers

- Poor self esteem
- Depression and anxiety
- Tiredness due to sleep disturbance
- Not eating, weight loss or weight gain
- Marked changes in attendance at College, unexplained absences from college, lengthy absences from college
- Marked changes in behaviour, students becoming withdrawn or aggressive
- Pregnancy
- STD

### **Possible indicators of abuse of vulnerable adults**

Some Possible Indicators of physical abuse:

- unexplained skin bruising
- unexplained cuts or abrasions
- unexplained burns
- unexplained fractures etc

However, please remember some physiological processes/medical conditions can cause changes which are hard to distinguish from some aspects of physical abuse.

Some possible indicators of neglect:

- poor hygiene
- malnutrition
- inappropriate clothing
- broken skin

Some possible psychological and emotional indicators:

- withdrawal
- depression
- cowering and fearfulness
- sudden changes in behaviour
- deliberate self-harm

Some possible indicators of sexual abuse:

- unexplained marked fluctuation of mood changes
- urinary infection
- pain, bruising or bleeding in genital or anal areas
- inappropriate sexually related activities/behaviour

Some general indicators which may suggest abuse:

- seeking shelter or protection
- unexplained reactions towards particular settings
- frequent or regular visits to the GP, or hospital casualty department, or hospital admissions
- frequent or irrational refusal to accept investigations or treatments for routine difficulties
- inconsistency of explanation

The following "trigger" behaviours may be additional indicators that abuse is occurring:

- destruction of physical environment
- turning night into day/sleep disturbance
- chronic incontinence
- extreme physical and/or emotional dependence
- verbal abuse and aggression towards the carer
- changes in personality – caused by illness and/or medication
- noncompliance with carer's wishes
- obsessive behaviour
- wandering/absconding
- self-harm

### Additional Information on Cyberbullying

Technology	Example of Misuse
Mobile phones	Sending nasty calls or text messages, including threats. Intimidation or harassment. Taking and sharing humiliating images. Videoing other people being harassed and sending these to other phones or internet sites
What's App Snap Chat	Sending inappropriate messages or content.
Email	Sending inappropriate, nasty or threatening messages. Forwarding unsuitable content including images and video clips, or sending computer viruses. Accessing someone else's account, e.g. to forward personal emails or delete emails.
Webcams	Making and sending inappropriate content. Persuading or threatening young people to act in inappropriate ways. Using inappropriate recordings to manipulate young people.
Social network sites e.g. Facebook, Twitter, Instagram and Snapchat  Internet dating sites (e.g. Tinder)	Posting nasty comments, humiliating images / video. Accessing another person's account details and sending unpleasant messages, deleting information or making private information public. Groups of people picking on individuals by excluding them. Creating fake profiles to pretend to be someone else, e.g. to bully, harass or get the person into trouble Trolling (posting inflammatory, extraneous, or off-topic messages in an online community with the deliberate intent of provoking the account holder) Vulnerable people may be exploited through relationships established on internet-dating sites
You tube	Posting embarrassing, humiliating film of someone.
Virtual Learning Environments	Posting inappropriate messages or images. Hacking into someone else's account to post inappropriate comments or delete schoolwork.
Gaming sites, consoles and virtual worlds	Name-calling, making abusive / derogatory remarks. Players may pick on weaker or less experienced users, repeatedly killing their characters. Forwarding unwanted messages to other devices in the immediate vicinity.
Identity Theft	Bank details and other personal information being stolen and used inappropriately

## Guidance on Prevent and the Channel Programme

### What is Prevent?

Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism, in all its forms. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.

### What is Channel?

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

### Who does Channel work with?

Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

### How does Channel work?

Each Channel Panel is chaired by a local authority and brings

together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

### What does Channel support look like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

### How will the person be involved in this process?

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

### Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

### What happens with the referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

### Raising a concern

If you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding or duty of care procedures within your organisation to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate.

For referrals to Channel or for more information around the process, in the first instance contact your local authority Prevent Coordinator.

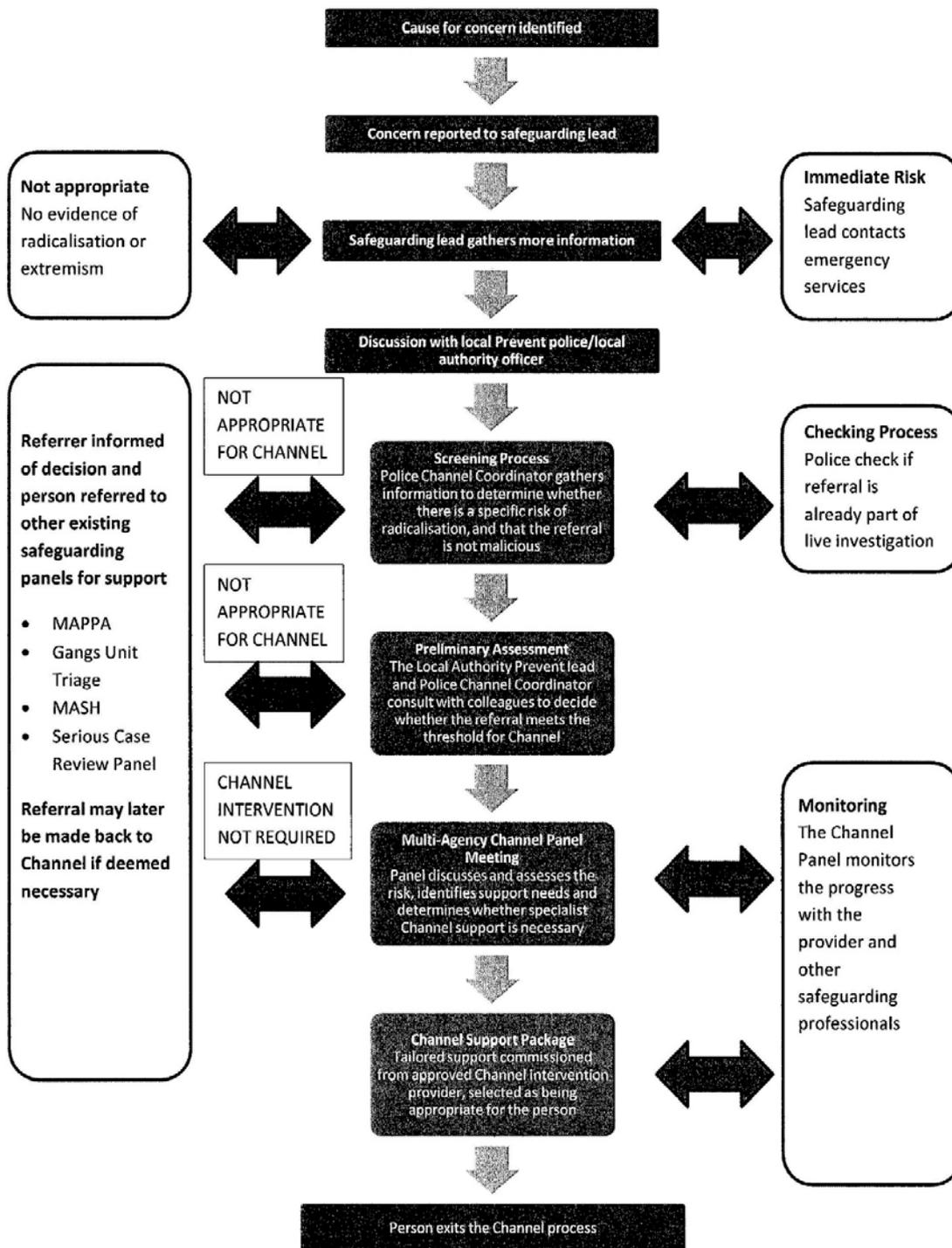
If you don't have a local authority coordinator or would like specific FE/HE guidance please contact:

[Kat.cooper@camden.gov.uk](mailto:Kat.cooper@camden.gov.uk)

or

[chris.bowles@camden.gov.uk](mailto:chris.bowles@camden.gov.uk)

## The Channel Process within FE Colleges



## SAFEGUARDING: NOMINATED MEMBERS OF STAFF

The Student Advisors will be the “Nominated Link Person” who is trained in the College’s safeguarding procedures.

### WHAT TO DO IF A STUDENT DISCLOSES AN ISSUE INVOLVING ABUSE OR IF YOU HAVE A SAFEGUARDING CONCERN

Student discloses an issue involving abuse to member of staff or  
Staff member has a safeguarding cause for concern

#### **Staff member is required to:**

- Inform Student Advisor immediately, or at earliest opportunity. If the Student Advisor (or nominated link person is unavailable, please contact the Designated Senior Person or stand-in.
- Fill in Concern Form available from the Staff portal (Safeguarding: *what to do if you are worried about a student* tab on the front page of the Portal “) and pass to the Student Advisor or Designated Senior Person. Do not ask student leading questions or ask for details.

#### **Acknowledge, listen, record and refer**

- Record conversation on concern form using exact words and contexts
- Sign and date form and email to safeguarding@cwc.ac.uk

**By doing the above you have fulfilled your obligations. You should not discuss the issue any further with the student once the referral has been made**

Campus/Directorate	Link Person	Location	Ext
<b>Paddington Green Campus</b>	Sophie Knight	Room 0SW2.5	2759
	Faye Tilyard Ethelin Meade	Room 0SW2.6	2836
<b>Queens Park Campus</b> ESOL, Business Development  Learners with Learning Difficulties and or Disabilities (Discrete provision)	Ethelin Meade	Room 105	2820
	Phil Bunce (HoS)	Room 133	2914
Designated Senior Person	Ita Leavy	0SW2.3	2768
Stand-in Designated Senior Person	Pat Squires	6SW2.1	2876

***If for any reason these people are not available contact your line manager***

### SAFEGUARDING CONCERN FORM

To: ..... Date of referral: .....  
(Faculty Nominated Link Person, see overleaf)

From: ..... Job title: .....

Name of Student: ..... Student ID: .....

D.O.B: ..... Course: .....

Students phone number: ..... Tutor: .....

Nature of Concern: .....  
.....  
.....  
.....

Action Taken: .....  
.....  
.....  
.....

Agencies involved? If so give Name and Contact details: .....  
.....  
.....  
.....

Signed: ..... Dated: .....



## City of Westminster

Safeguarding Adults Team

4 Frampton Street

London NW8 8LF

### Safeguarding Adults Alert Form (SA1)

To be completed by staff member or a third party who witnessed or was informed about the alleged or suspected abuse.

Safeguarding Adults: 020 7641 2176

Emergency Duty Team: 020 7641 6000

Safe Haven Fax: 020 7641 1593 (office hours only)

Email: [safeguardingadults@westminster.gov.uk](mailto:safeguardingadults@westminster.gov.uk)

#### DETAILS OF VULNERABLE ADULT

NAME				SWIFT / User ID		
Address						
DOB		AGE		GENDER		
USER GROUP	Learning Disability				Mental Health	
	Older People				Physical & Sensory	
	Substance Misuse				Other vulnerable people	
ETHNIC ORIGIN	White British		White Irish		Other White	
	White Traveller of Irish Heritage		White Gypsy/Roma			
	Black Caribbean		Black African		Other Black	
	Indian		Pakistani		Bangladeshi	
	Chinese		Other Asian		Mixed White and Black Caribbean	
	Mixed White and Black African		Mixed White and Asian		Mixed White and Chinese	
	Other					

RELIGION	Christian COE		R Catholic		Buddhist	
	Hindu		Muslim		Sikh	
	Jewish		None			

ALLEGED, SUSPECTED , WITNESSED OR REPORTED ABUSE / INCIDENT(S)						
DESCRIPTION OF THE ALLEGED, SUSPECTED OR WITNESSED ABUSE WHAT WAS SEEN, SAID WHO ELSE WAS PRESENT ETC.						
DATE & TIME OF ALLEGED, SUSPECTED OR WITNESSED ABUSE			DATE & TIME ALERT REPORTED			
ABUSE SETTING	Own Home		Supported Housing			
	Residential Care (permanent)		Nursing Care (permanent)			
	Residential Care (temporary)		Residential Care (temporary)			
	Alleged perpetrator's home		Mental health inpatient setting			
	Acute hospital		Community hospital			
	Other health setting		Day centre/service			
	Education/training/workplace establishment		Not known			
	Public Place					
	Other (please give details)					
TYPE OF ABUSE	Physical		Sexual			
	Psychological		Emotional			
	Financial		Neglect / Act of Omission			
	Discriminatory		Institutional			
SOURCE OF REFERRAL	Domiciliary care staff		Residential/nursing care staff			
	Day care staff		Social worker/care manager			
	Self-directed care staff		Other social care staff			
	Primary/community health staff		Secondary health staff			
	Mental health staff		Self-referral			
	Family member		Friend/neighbour			
	Other service user		Care Quality Commission			
	Housing		Education/training/workplace establishment			
Police		Other				



ALLEGED PERPETRATOR'S DETAILS (Do not put details if employed by the Authority)							
NAME		DOB		AGE		GENDER	
ADDRESS							
IS ALLEGED PERPETRATOR	Partner			Other family member			
	Health care worker			Volunteer/befriender			
	Domiciliary care staff			Residential care staff			
	Day care staff			Social worker/care manager			
	Self-directed care staff			Other social care staff			
	Another Service User			Statutory Agency			
	Friend/neighbour			Stranger			
	Other			Not known			
	Institutional Abuse						
Is the alleged perpetrator the main family carer?							
WAS ALLEGED PERPETRATOR LIVING WITH VULNERABLE ADULT AT TIME OF ABUSE?				Still living with vulnerable adult?			
PLEASE GIVE DETAILS OF PERPETRATOR AND RELATIONSHIP							
DETAILS OF IMMEDIATE ACTION TAKEN TO SAFEGUARD THE VULNERABLE ADULT (IF ANY)							
DETAILS OF ANY RECORDS MADE AND WHERE HELD EG; INCIDENT REPORTS, CASE NOTES, REGULATION 37 NOTIFICATION TO CQC ETC.							

**DETAILS OF THE PERSON COMPLETING THIS FORM**

NAME	JOB TITLE / PROFESSION	CONTACT DETAILS	DATE

**DETERMINING LEVEL OF RESPONSE (To be completed by Westminster Adults Services Manager/ SAM)**

RISK ASSESSMENT	Risk: Benefits of taking risk: Hazards contributing to danger: Dangers i.e. physical abuse Probability/ likelihood (i.e. L, M, H and reasons in relation to <b>current circumstances, environment, past, frequency, duration</b> ) Capacity related to safeguarding/ risk: Protection Plan:
ACTUAL START DATE	
OUTCOME	NFA under safeguarding <input type="checkbox"/>  Strategy Meeting required Yes <input type="checkbox"/> No <input type="checkbox"/>
ADVOCACY	IS THE USE OF AN ADVOCATE (INCLUDING IMCA) INDICATED? Yes <input type="checkbox"/> No <input type="checkbox"/>  If yes, who is the advocate?
DECISION DATE (ACTUAL END DATE)	

**DETAILS OF THE MANAGER MAKING DECISION**

NAME	JOB TITLE / PROFESSION	CONTACT DETAILS	DATE