



Safeguarding Policy and Guidance

Frequency of Review: Annual (Statutory requirement)

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Ratified by Trustees on: July 8th 2021

Signed by Caroline Lane

Chair of Board:

Date:

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IMPORTANT CONTACTS

ROLE	NAME	CONTACT DETAILS
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Safeguarding Statement - COVID-19

The Safeguarding Addendum details any changes that the college may need to make to the procedures detailed in this policy as a response to the COVID-19 outbreak.

Whether the college is fully open, partly open or closed, Victoria College will continue to be committed to safeguarding and protecting its students.

1. Introduction

- 1.1 It is the duty of everyone at but not limited to all Victoria College trustees, students, staff and volunteers to provide a safe and secure environment in which vulnerable young people and adults can thrive and develop and where all aspects of their welfare will be protected. It is recognised by Victoria College that its students may be more likely to be vulnerable to abuse because of their disabilities. The term 'student' is used throughout this policy and refers to all service users of Victoria College provision. It also applies to students who come into contact with students across the federation.
- 1.2 Victoria College Board of Trustees, though the Head of College and Executive Headteacher aims to provide effective safeguarding procedures for children and adults that provide clear direction to staff and volunteers about expected codes of behaviour in dealing with safeguarding issues. This policy also makes explicit the College's commitment to the development of good practice and sound procedures. It ensures that safeguarding concerns and referrals are handled sensitively, professionally and in ways that support the needs of students who attend Victoria College.
- 1.3 The College recognises its moral and statutory responsibility to safeguard and promote the welfare of all students. The College endeavours to provide a safe and welcoming environment where all students are respected and valued. Staff are alert to the signs of abuse and neglect and follow clear procedures to ensure that students receive effective support, protection and justice. The protection of vulnerable adults forms a part of the college's safeguarding responsibilities.
- 1.4 The College is committed to working with families, carers and agencies to ensure the welfare of its students by minimising or eliminating the risk of abuse. All students attending the college have an EHCP Plan that has been issued by a Local Authority. Place led funding for the students is supplied by the ESFA. 'Top up' or 'needs led' funding is supplied by various local authorities. The college is part of a soft Federation with Cherry Oak School and Victoria School where it is able to access some facilities/resources. As such, some of the guidance that is followed by the college and is included in this policy may relate to children as well (for example, Keeping Children Safe in Education). All guidance used is equally pertinent to the needs of the young adults and the staff working at our setting.
- 1.5 The College will ensure that all working partners are aware of this policy by displaying appropriate information in our reception area and on the college website and by raising awareness at meetings with parents and carers.

- 1.6 Safeguarding vulnerable adults at Victoria College involves:
- Reducing or preventing the risk of significant harm from neglect or abuse
 - Supporting students to maintain control of their own lives.
 - Ensuring students can live in safety, free from abuse and neglect
 - Empowering students by encouraging them to make their own decisions and provide informed consent wherever possible
 - Promoting the well-being of students and taking their views, wishes, feelings and beliefs into account.
 - Preventing impairment of health or development
 - Acting to enable students to have the best life chances and outcomes
- 1.7 This policy has been developed in accordance with the principles established by the:
- Care Act 2014 which introduced new responsibilities for local authorities and puts adult safeguarding on a statutory footing.
 - Data Protection Act 2018
 - Deprivation of Liberty Safeguards, which have been designed to provide appropriate safeguards for vulnerable people who have a mental disorder and lack the capacity to consent to the arrangements made for their care or treatment, and who may be deprived of their liberty in their best interests in order to protect them from harm.
 - Disclosure and Barring Service 2013 which outlines criminal record checks and guidance for employers
 - Human Rights Act 1998
 - Mental Capacity Act 2005 whose general principle is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and should be the least restrictive intervention
 - Modern Slavery Act 2015
 - Policing and Crime Act 2017
 - Protection of Freedoms Act 2012
 - Safeguarding Vulnerable Groups Act 2006, which introduced the new Vetting and Barring Scheme and the role of the Independent Safeguarding Authority
 - Sexual Offences Act 2003, which introduced a number of new offences concerning adults at risk
- 1.8 Underpinning guidance also includes:
- Safeguarding adults: A National Framework of Standards for Good Practice in Adult Protection Work
 - Working Together to Safeguard Children (2018), which contains advice and guidance pertinent to the students attending Victoria College
 - Keeping Children Safe in Education 2021, which contains advice and guidance pertinent to the students attending Victoria College
 - The procedures of the Birmingham, Dudley and Worcestershire Safeguarding Adults Boards.
 - Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of students
 - The Children and Families Act 2014,
 - Ofsted guidance and procedures
 - The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on an interview/appointment panel to be trained in safer recruitment techniques
 - Statutory guidance on Female Genital Mutilation, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
 - The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children and vulnerable adults
 - Statutory guidance on the Prevent duty, which explains schools' and colleges' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism Statutory guidance - Prevent duty guidance: for further education institutions in England and Wales, Updated 1 April 2021
 - Teaching online safety in Schools (DfE, June 2019)
 - UK Council for Internet Safety (UKCIS)27 guidance: Education for a connected-world
 - National Crime Agency's CEOP education programme: Thinkuknow

- Public Health England: Rise Above

1.9 Victoria College values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. All students and staff have the right to speak freely and voice their opinions. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Victoria College seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, to Far Right/Neo Nazi/ White Supremacist ideology, or other extreme groups.

1.10 The College fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of vulnerable adults. Staff at the College understand that vulnerable adults:

- Have the right to be protected from harm
- Need to be safe and to feel safe
- Need support which matches their individual needs
- Have the right to speak freely and voice their values and beliefs, and be provided with the necessary help and support to help them to do this
- Must be encouraged to respect each other's values and support each other
- Have the right to be supported to meet their emotional and social needs as well as their educational needs

1.11 All safeguarding work carried out by the College reflects the following key principles:

- **Empowerment**
Students should be consulted about the outcomes they want from the safeguarding process and this should directly inform what happens
- **Prevention**
It is better to take action before harm occurs. Students should be provided with easily understood information about what abuse is, how to recognise the signs and what they can do to seek help
- **Proportionality**
Students should be confident that the responses to risk will take into account their preferred outcomes or best interests and that the least intrusive response appropriate to the risk presented will be taken.
- **Protection**
Students should be provided with support and representation and be enabled to take part in the safeguarding process as is appropriate to their needs or wishes
- **Partnership**
Students should be confident that information will be appropriately shared in a way that takes into account its personal and sensitive nature and that agencies will work together to find the most effective responses for their individual circumstances
- **Accountability**
There should be accountability and transparency in delivering safeguarding and students should be clear about the roles and responsibilities of all those involved in reaching a solution to a problem.

1.12 There are five main elements to this policy:

- Ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with vulnerable adults
- Raising awareness of protection issues relating to vulnerable adults and equipping them with the skills needed to keep safe
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse
- Supporting vulnerable adults who have been identified as in need of help, support or protection in accordance with any agreed plans developed in collaboration with colleagues from health, social care or other relevant organisations
- Establishing a safe environment in which vulnerable adults can learn and develop

1.13 This policy will contribute to safeguarding and promoting the welfare of students at the College by:

- Clarifying standards of behaviour for staff and students

- Contributing to the establishment of a safe, resilient and robust ethos in the College, built on mutual respect and shared values
- Embedding appropriate work relating to safeguarding and welfare within the curriculum
- Guiding students into safely embarking upon work experience or community projects
- Alerting staff to the signs and indicators that all might not be well
- Developing staff awareness of the causes of abuse
- Developing staff awareness of the risks and vulnerabilities their students face
- Addressing any concerns at the earliest possible stage
- Reducing the potential risks students' face of being exposed to violence, extremism, exploitation or victimisation

2. General Data Protection Regulations (GDPR)

2.1 Victoria College staff will have due regard to data protection principles which allow them to process (and withhold) personal and special category data as part of the processing condition to safeguard young people and individuals at risk. This condition also allows professionals to share information without consent where there is good reason to do so. KCSIE (2021) states "The DPA 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children". See also document 'Information Sharing: Advice for practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (2018).

3. Safeguarding Commitment

3.1 The College follows the Birmingham (Dudley and Worcestershire) Safeguarding procedures and takes account of any guidance issued by the Department for Education (DfE).

3.2 Victoria College ensures:

- It has a senior leader nominated as Designated Safeguarding Lead (DSL) who has received appropriate training and support for this role
- It has at least one member of staff who will act in the absence of the DSL (Deputy DSL)
- It has a nominated Director who will take leadership responsibility for the College's safeguarding arrangements.
- That the DSL and/or a deputy DSL is always available to speak to during College hours and has made adequate and appropriate cover arrangements for any out of hours activities.

3.3 Victoria College ensures every member of staff (including temporary and supply staff and volunteers) and the Directors know the name of the DSL and any deputies and understands their role

3.4 Victoria College ensures that all staff, volunteers and directors:

- Are alert to the potential need for early help or support
- Are aware of those adults whose vulnerabilities may indicate a greater need
- Are aware of the role they may play in supporting other agencies and professionals in offering early help or support
- Understand their responsibilities in being alert to the signs of abuse and neglect including the specific issues of Sexual Exploitation, County Lines, Radicalisation and Extremism, Sexual Violence and Sexual Harassment including peer on peer abuse.
- Maintain an attitude of 'it could happen here';
- Understand their responsibility for referring any concerns to the DSL, Deputy DSL or Directors in a timely manner
- Are aware that they may raise concerns directly with Social Care if they believe their concerns have not be listened to or acted upon
- Feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines

3.5 Victoria College utilises 'MyConcern' for safeguarding referrals. Online activity within Victoria College is monitored to ensure inappropriate sites are not accessed by students or staff.

The specialist online software used for this purpose is E Safe (Smoothwall) and the filtering system is E-Safe (Smoothwall) There are good links between the Designated Safeguarding Lead (DSL) and the IT/Resources Team to ensure effective reporting and monitoring of safeguarding concerns. It is

recognised that students may access the internet while at College using their own data plan. We aim to ensure online safety is embedded in our curricula at appropriate levels and with support. We are clear about our expectations of acceptable use through policies including the Student Code of Conduct.

3.6 Victoria College ensures that:

- The parent carers of students attending the College have an understanding of the responsibility placed on staff for safeguarding vulnerable adults by publishing this policy on the College's website
- Community users organising activities for vulnerable adults at the College are aware of, and understand the need for compliance with, the College's guidelines and procedures in relation to the safeguarding of vulnerable adults
- The duty of care towards its students and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assisting staff to monitor their own standards and practice
- All staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines
- All staff are aware of and follow procedures set out by the DfE and the relevant LA guidance for that student or member of staff, where an allegation is made against a member of staff or volunteer.
- A referral is made to the DBS if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criteria is met or would have been had they not resigned
- It operates safer recruitment practices, ensuring that at least one member on every recruitment panel has completed safer recruitment training

3.7 Victoria College procedures will be regularly reviewed and updated at least annually unless an incident or new legislation or guidance requires the need for an interim review.

3.8 Victoria College recognises the expertise that College staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Staff are, therefore, invited to contribute to and shape this policy and associated safeguarding arrangements.

4 Training

4.1 When staff join Victoria College, they are informed of the arrangements for safeguarding vulnerable adults. They are given a copy of this policy including its appendices, the student behaviour policy, Part 1 and Annex A of Keeping Children Safe in Education 2021 and the College's Code of Conduct. They will also be told who the DSL is, who acts in their absence and what this role includes. Staff are required to sign a form stating that they have read and understood each of these documents.

4.2 All staff receive a safeguarding induction. This includes basic information relating to signs and symptoms of abuse (Appendices A), how to manage a disclosure, when and how to record a safeguarding concern and advice on safe working practice.

4.3 All volunteers, supply staff, contractors and regular visitors to the College are told where the Safeguarding Policy is kept, given the name of the DSL and deputy and informed of the College's procedures for reporting concerns.

4.4 All staff receive regular safeguarding training that includes the principles of safer working practice, signs and symptoms of abuse and neglect, as well as specific safeguarding issues, such as sexual exploitation, radicalisation, on-line safety, peer on peer abuse, sexual violence and sexual harassment. Training also includes how to record and report abuse both within the College and to Social Care.

4.5 Training takes the form of face to face training every year. On-line universal safeguarding training is available to staff starting at the college part-way through the year. In addition, staff receive safeguarding updates from the DSL as required, but at least annually. Face to Face training will be delivered to all new staff at the start of each academic year in order to ensure that they receive this training.

- 4.6 The Designated Safeguarding Lead (and any deputies) undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years and includes Prevent Awareness Training. The training provides designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, so they:
- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority social care referral arrangements
 - Ensure each member of staff has access to, and understands, the college's safeguarding policy and procedures, especially new and part time staff
 - Are alert to the specific needs of individual students
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
 - Understand the importance of information sharing, both within college and with the other agencies, organisations and practitioners
 - Understand and support the college with regards to the requirements of the Prevent Duty and are able to provide advice and support to staff on protecting students from the risk of radicalisation
 - Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep students safe whilst they are on-line at college
 - Can recognise the additional risks that young adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND students to stay safe online
 - Obtain access to resources and attend any relevant or refresher training courses
 - Encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.
- 4.7 In addition to formal training the DSL (and any deputies) also update their knowledge and skills via briefings, network meetings and seminars, at regular intervals and at least annually.
- 4.8 Staff with management responsibilities undertake further relevant training in safeguarding related issues such as Sexual Exploitation, Radicalisation (WRAP training), Sexual Violence and Sexual Harassment and the Management of Allegations of Abuse. They then cascade the learning from this training to the rest of the staff.

5 Responsibilities of Victoria College Trustees

- 5.1 The Board of Trustees is responsible for strategic development of the policy and for monitoring its effectiveness.

The Board of Trustees is responsible for monitoring Victoria College's compliance with statutory duties by receiving an annual Safeguarding Report from the College Management Team. This report will outline safeguarding training, induction and review of policies and details of referrals/allegations of abuse.

All Trustees are required to remain updated about student welfare concerns and be satisfied that issues raised by students at the Student Services Forum are dealt with appropriately.

The Trustees receive regular Health and Safety reports from the Head of College.

The Board will appoint a Trustee as the Designated Trustee with responsibility for Safeguarding. Sadie Bolton.

- 5.2 The **Directors** will nominate a senior leader to take responsibility for safeguarding at the College. They will ensure that:
- The DSL takes lead responsibility for safeguarding and does not delegate this responsibility
 - Safeguarding policies and procedures are in place, available on the College's website and reviewed annually

- Mechanisms are in place to assist staff to understand and discharge their role and responsibilities
- Termly reports on the effectiveness of the College's safeguarding procedures are presented to the Directors
- Any weaknesses brought to its attention relating to safeguarding are remedied without delay
- It complies with all legislative duties, including the duty to prevent vulnerable adults from being drawn into terrorism
- The Safeguarding policies and procedures are fully implemented and followed by all staff
- Sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to young person protection
- All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures
- All allegations of abuse against staff are reported to the LADO in a timely manner
- Directors have an enhanced criminal records certificate from the DBS. It is the responsibility of the Chair of Directors to apply for the certificate for any of their directors who do not already have one. Being a member of the directors is not a regulated activity and so directors do not need a barred list check unless, in addition to their director duties, they also engage in regulated activity.
- The College carries out a Section 128 check for college directors, because a person subject to one is disqualified from being a director
- The college operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers
- The Head of CollegeHead of College, a nominated director and other staff involved in the recruitment process have undertaken Safer Recruitment training
- There are procedures for dealing with allegations of abuse against members of staff and volunteers/people in a position of trust
- There is a senior member of the management team who is designated to take lead responsibility for dealing with student protection (the "Designated Safeguarding Lead") and there is always cover for this role with appropriate arrangements for before/after college and out of term activities
- The Designated Safeguarding Lead undertakes effective training (in addition to basic protection training) and this is refreshed every two years. In addition to this formal training, directors should ensure that their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings etc.
- The Head of CollegeHead of College, and all other staff and volunteers who work with vulnerable young adults undertake appropriate training which is regularly updated (at least every year)
- New staff and volunteers who work with vulnerable young adults are made aware of their responsibilities (including this policy and Part 1 of Keeping Children Safe in Education 2020, update April 2021). Training should include indicators of FGM; early signs of radicalisation and extremism; indicators of vulnerability to radicalisation. This training should take place every year
- The Chair of Directors (or, in the absence of a chair, the Vice Chair) deals with any allegations of abuse made against the Head of College, with advice and guidance from the Local Authority Designated Officer (LADO)
- Students are taught about safeguarding, including online safety, as part of a broad, balanced and appropriate curriculum
- The college complies with all legislative safeguarding duties, including the duty to prevent young people from being drawn into terrorism. In conjunction with the Head of College/DSL they should assess the level of risk within the college and put actions in place to reduce that risk

5.3 Responsibility of Victoria College's Designated Trustee

Victoria College has a Designated Trustee responsible for Safeguarding – Sadie Bolton and a member of staff, Clare Scattergood Head of College as the DSL.

The Designated Trustee will:

- Liaise regularly with the DSL about policy and practice at the College
- Promote effective governance of this policy

- Ensure he or she undertakes two yearly training and keeps up to date with developments in legislation, policy and best practice

- 5.4 The **DSL and deputy DSL** will, together, coordinate action on safeguarding and promoting the welfare of vulnerable adults within the setting. The DSL and Deputy DSL are responsible for:
- Organising safeguarding induction training for all newly appointed staff and whole staff training, at least every year with updates as required
 - Ensuring the safeguarding policies and procedures adopted by the Directors are effectively implemented and followed by all staff
 - Sufficient resources and time are allocated to enable themselves, as Safeguarding Leads, and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of students
 - Allegations of abuse or concerns that a member of staff or adult working at college may pose a risk of harm to a young person are notified to the Local Authority Designated Officer in a timely manner
 - During term time, the Designated Safeguarding Lead and/or a deputy is always available (during college hours) for staff in the college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be available in person, in exceptional circumstances availability via phone, video conference or other such media may be necessary. Appropriate cover arrangements are arranged for any out of hours/out of term activities.
 - Undertaking, in conjunction with the Directors, an annual audit of safeguarding procedures
 - Referring students to the Adult Safeguarding Team when there are concerns about possible abuse and neglect
 - Referring a student to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups
 - Meeting regularly to ensure that both remain fully informed of all safeguarding issues, especially ongoing investigations and police investigations
 - Liaising with other staff on matters of safeguarding and deciding whether to make a referral to relevant agencies
 - Keeping electronic records, via MYCONCERN, of concerns about students, including the use of body maps, even where there is no need to refer the matter immediately
 - Ensuring that any 'physical' safeguarding records are kept securely, separate from the main student file, and in locked or password protected locations
 - Ensuring that all electronic safeguarding systems are logged out of when a computer is left unattended
 - Ensuring that all safeguarding files are transferred in a safe and timely manner when a student moves settings and that a receipt of transfer is obtained
 - Monitoring absence and reporting concerns in line with appropriate procedures
 - Developing effective links with relevant agencies and other professionals and co-operating, as required with their enquiries regarding safeguarding matters
 - Coordinating a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the promotion of fundamental British values.
 - Acting as a source of support, advice and expertise for all staff.
 - Notify social care immediately if there is an unexplained absence of a student who is subject to an Adult Safeguarding Plan
 - Monitor unauthorised absence, particularly where students go missing on repeated occasions and reporting concerns to adult social care
- 5.5 **College staff** (including volunteers and supply staff) are responsible for:
- Maintaining an attitude of 'it could happen here'
 - Reporting any concerns promptly to the DSL if they are worried about a student
 - Reporting a concern promptly to the Head of College if they are concerned about the behaviour of a member of staff
 - Effectively engaging with all training offered so that they are able to promptly identify the signs and symptoms of abuse, know how to report concerns and know how to record concerns clearly/effectively using the appropriate procedures

5.6 When a Designated Safeguarding Lead resigns their post or no longer has safeguarding protection responsibility, there will be a full face-to-face handover/exchange of information with the new post holder. In exceptional circumstances when a face-to-face handover is not feasible, the Head of College will ensure that the new post holder is fully conversant with all procedures and case files.

6 Procedures for Managing Concerns

- 6.1 Victoria College has a procedure in place that adheres to safeguarding procedures that have been agreed locally through the Birmingham Safeguarding Adults Board. All referrals will be made in line with local procedures as detailed on the Birmingham Council website (<https://www.birmingham.gov.uk/safeguardingadults>)
- 6.2 When concerned about the welfare of a student, staff members are expected to always act in the interests of the student and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping a student safe.
- 6.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the young person at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.
- 6.4 College staff understand that it is not their responsibility to investigate welfare concerns or to determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 6.5 The Designated Safeguarding Lead (DSL) is the first point of contact for concerns and queries regarding any safeguarding issue. Any member of staff or visitor to the College who receives a disclosure of abuse or suspects that a young person is at risk of harm is expected to report it immediately to the DSL or, if unavailable, to the Deputy DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff or to Adult Social Care.
- 6.6 College staff are expected to report all concerns about a student, without delay, to the DSL and record, as soon as possible and certainly before the end of the working day, as an 'Incident' on MYCONCERN.
- 6.7 Following receipt of any information raising concern, the DSL will consider what action to take. All information and actions taken, including the reasons for any decisions made, are fully documented on MYCONCERN.
- 6.8 If, at any point, there is a risk of immediate serious harm to a young person a referral is made to Social Care immediately. Anybody can make a referral. If the student's situation does not appear to be improving the staff member with concerns is able to press for reconsideration by raising concerns again with the DSL. Staff understand that concerns should always lead to help for the young person at some point.
- 6.9 Staff are expected to follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with social care or the police if:
- The situation is an emergency and the DSL, or their deputy are unavailable;
 - They are convinced that a direct report is the only way to ensure the Student's safety.
- 6.10 Any member of staff who does not feel that concerns about a student has been responded to appropriately and in accordance with the procedures outlined in this policy are requested to raise their concerns with the Chair of Directors.

6.11 If any member of staff does not feel the situation has been addressed appropriately at this point they are aware that they are able to contact social care directly with their concerns.

7 Specific Safeguarding Issues

Students Missing Education

- 7.1 College staff recognise that a student going missing from education is a potential indicator of abuse or neglect. As such, attendance, absence and exclusions are closely monitored.
- 7.2 Staff will make every attempt to obtain at least two emergency contact numbers for each student registered at the College in order to ensure that they are able to make contact with a responsible adult when a student missing education is also identified as a welfare and/or safeguarding concern.
- 7.3 College staff will also ensure that they follow the procedures for dealing with vulnerable adults that go missing from education, particularly on repeat occasions, in order to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of them going missing in future.

Sexual Exploitation (Appendix B)

- 7.4 College staff recognise that sexual exploitation is a form of sexual abuse involving criminal behaviours against vulnerable adults which can have a long-lasting adverse impact on their physical and emotional health. Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual. Victims can be male or female. Vulnerable adults are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to trafficking. Young adults with learning difficulties or disabilities are particularly vulnerable to such exploitation.
- 7.5 Sexual Exploitation does not always involve physical contact; it can occur through the use of technology. It can also include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- 7.6 Victoria College addresses the risks of sexual exploitation, as appropriate, through the curriculum. A common feature of sexual exploitation is that the individual concerned often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. They may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.
- 7.7 All staff, volunteers and directors are made aware of the indicators of sexual exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual. All concerns of sexual exploitation are reported immediately to the DSL.
- 7.8 The DSL will use the Safeguarding Screening Tool on all occasions when there is a concern that a student is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a young adult who is being or who is at risk of being sexually exploited. In all cases if the tool identifies any level of concern the DSL will contact adult social care. If a student is in immediate danger the police will be called on 999.

Criminal Exploitation (CE) - County Lines (Appendix C)

- 7.9 CE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a vulnerable adult into any criminal activity
 - In exchange for something the victim needs or wants, and/or
 - For the financial or other advantage of the perpetrator or facilitator and/or
 - Through violence or the threat of violence.In addition, CE does not always involve physical contact; it can also occur through the use of technology. The victim may have been criminally exploited even if the activity appears consensual.

- 7.10 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas, within the UK, using dedicated mobile phone lines or other form of “deal line”. Typically, the gang exploits young or vulnerable people to store and/or supply drugs, move cash and to secure the use of homes belonging to vulnerable adults. There is a cross over between sexual exploitation and County Lines and young people are sometimes required to offer sex in order to pay off perceived debts
- 7.11 Concerns about young people being possibly involved are passed to the DSL who will refer to Police.

Domestic Abuse (Appendix D)

- 7.12 The cross-government definition of 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 and emotional abuse
- 7.13 College staff recognise that exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on students. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting vulnerable adults can also occur within their personal relationships as well as in the context of their home life.
- 7.14 College staff will ensure that students are educated to ensure they understand what a healthy relationship looks like.
- 7.15 All concerns regarding domestic abuse are reported to the DSL, who will ensure that appropriate support is available to the young person and make referrals to social care if the threshold for intervention is met.

Extremism and Radicalisation (Appendix E)

- 7.16 Victoria College is subject to a duty, under section 26 of the Counter-Terrorism and Security Act 2015 (CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent duty.
- 7.17 Terrorism is an action that:
- Endangers or causes serious violence to a person/people
 - Causes serious damage to property or
 - Seriously interferes or disrupts an electronic system.
- The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause
- 7.18 Extremism is defined as a ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs’. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- 7.19 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 7.20 Vulnerable adults are vulnerable to extremist ideology and radicalisation. Some, as a result of this, are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Similar to protecting students from other forms of harms and abuse, protecting students from this risk is a part of the college’s safeguarding approach.
- 7.21 Victoria College is clear that exploitation of vulnerable adults and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and college providers on preventing children and young people from being drawn into terrorism.
- 7.22 Victoria College seeks to protect students against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White

Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

- 7.23 Staff will use their judgement in identifying students who might be at risk of radicalisation and act proportionately. This may include the SPOC or deputy DSL making a Prevent referral. The college's designated prevent lead is aware of local procedures for making a Prevent referral.
- 7.24 When any member of staff has concerns that a students may be at risk of radicalisation or involvement in terrorism, they should report this to the DSL and report it on MYCONCERN. The DSL will then speak with the SPOC. Staff should follow normal safeguarding procedures. If the matter is urgent then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and directors to raise concerns around Prevent (020 7340 7264).
- 7.25 Through training, staff, volunteers and directors will have an understanding of what radicalisation and extremism is, why we need to be vigilant in college and how to respond when concerns arise. In addition:
- There are systems in place for keeping students safe from extremist material when accessing the internet in our college by using effective filtering and usage policies.
 - The SPOC has received Prevent training and will act as the point of contact within our college for any concerns relating to radicalisation and extremism.
 - The SPOC will make referrals in accordance with West Mercia adult safeguarding procedures and will represent our college at Channel meetings as required.
 - The college will use relevant information, tools and resources to help staff and Parent Carers recognise and address extremism and radicalisation in young people, for example the 'Educate Against Hate' website.
- 7.26 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from college will be available to attend the Channel panel to help with this assessment should this be necessary
- 7.27 Through the curriculum, college staff promote the spiritual, moral, social and cultural development of vulnerable adults. They encourage students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- 7.28 The SPOC for the College is Clare Scattergood

'Honour Based' Abuse (HBA)

- 7.29 College staff recognise that they are well placed to identify concerns and take action to prevent vulnerable adults from becoming victims of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through safeguarding training. If staff have a concern regarding a young person that might be at risk of HBA they are aware that they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and social care.
- 7.30 So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation, forced marriage, and practices such as breast ironing.

Female Genital Mutilation (Appendix F)

- 7.31 Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of abuse and violence against women.
- 7.32 Where staff have concerns relating to FGM they should report this to the DSL and follow the college safeguarding procedures

Forced Marriage (Appendix G)

- 7.33 A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical or emotional and psychological. Forcing a person into a marriage is a crime in England and Wales. Some perpetrators also use perceived cultural practices as a way to coerce a person into marriage.
- 7.34 Forced marriage is recognised in the UK as a form of violence and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.
- 7.35 A forced marriage is not the same as a pre-introduced or arranged marriage which is common in several cultures, whereby the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.
- 7.36 Victoria College will contact adult social care when they have a concern about a student. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or discloses that it has happened to them or to an older sister the college will contact the police.
- 7.37 College staff will not:
- Contact the Parent Carers before seeking advice from Adult Social Care
 - Make any attempt to mediate between the young person and their parent carers. Attempts to mediate may place the young person at greater risk, and the family may feel so threatened at the news of the disclosure that they bring forward their plans or take action to silence the young person.
- 7.38 In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help. As such, it is essential that college staff take such concerns seriously and act without delay.

Modern Slavery

- 7.39 The Modern Slavery Act 2015 places a new statutory duty on public authorities to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. College staff are aware of this duty and inform the DSL should they suspect or receive information that students or their carers may be victims of modern slavery. The DSL will then contact the NCA.

Peer on Peer Abuse (including sexual violence and sexual harassment)

- 7.40 College staff recognise that vulnerable adults are also vulnerable to physical, sexual and emotional abuse by their peers. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; and initiation/hazing type violence and rituals.
- 7.41 Such abuse is always taken seriously and the same safeguarding procedures apply in respect of any student who is suffering or likely to suffer significant harm. Staff are aware that they must never tolerate or dismiss concerns relating to peer on peer abuse and must not pass it off as 'banter' or 'just having a laugh'.
- 7.42 The DSL ensures that, through training, staff, volunteers and directors have an understanding of the range of peer on peer abuse, including sexual violence and sexual harassment, and are aware of how to recognise and manage such issues. Staff are also made aware that some groups are potentially more at risk, for example girls, students with SEND and LGBT students.
- 7.43 Staff are made aware that such incidents and/or behaviours can occur and be associated with factors outside of the college. As such, staff, and particularly the DSL, know to consider the context in which such incidents and/or behaviours occur.

- 7.44 Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with the College's Behaviour and Anti-Bullying policies. All such incidents are recorded on MYCONCERN.
- 7.45 Support for the victims of abuse will also be in line with the College's Behaviour and Anti-Bullying policies. For victims of sexual abuse, College staff are advised to follow advice given by Social Care and consider using external agencies, such as West Mercia Rape and Sexual Abuse Support Centre to support any strategies that they may be able to provide within the College.
- 7.46 Depending on the nature of abuse, College staff may need to consider providing measures to protect and support the victim, the alleged perpetrator and other vulnerable adults and/or staff in the College by means of a risk assessment. The risk assessment will be recorded and kept under review.

Up skirting

- 7.47 The Voyeurism (Offences) Act, which is commonly known as the Up skirting Act, came into force on 12 April 2019. 'Up skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.
- 7.48 Support for the victims of such abuse will be in line with support outlined in the colleges Behaviour and Anti-Bullying policies. For victims of sexual abuse, Victoria College will follow advice given by Adult Social Care and consider using external agencies, such as Early Help or West Mercia Rape and Sexual Abuse Support Centre to support any strategies that they may be able to provide within college.
- 7.49 Depending on the nature of abuse, Victoria College may need to consider providing measures to protect and support the victim, the alleged perpetrator and other students and/or staff in the college by means of a risk assessment. The risk assessment will be recorded and kept under review.

Homelessness

- 7.50 Being homeless or being at risk of becoming homeless presents a real risk to a persons' welfare. The Designated Safeguarding Lead (and any deputies) are aware of contact details and referral routes in to the Local Housing Authority so they can raise or progress concerns at the earliest opportunity.
- 7.51 Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into adult social care where a student has been harmed or is at risk of harm.
- 7.52 The Homelessness Reduction Act 2017 placed a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The duties shift focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

8 Racist Incidents

- 8.1 The College's policy on racist incidents is set out in a separate policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under safeguarding procedures. Staff maintain a log of racist incidents in the College via MYCONCERN.

9 Anti-Bullying

- 9.1 The College's policy on anti-bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under safeguarding procedures.

9.2 All incidences of bullying, including cyber-bullying, prejudiced based and discriminatory bullying, sexting, racist, homophobic and gender-related bullying, are dealt with in accordance with the anti-bullying policy. College staff recognise that vulnerable adults with special needs and/or disabilities are more susceptible to being bullied. A log of bullying incidents in the College is maintained via MYCONCERN.

9.3 College staff recognise that there will be occasions when bullying incidents will fall within safeguarding procedures or may be deemed criminal activity and that it may be necessary to report the concerns to social care or to the Police.

10 Online Safety

10.1 The DSL and Deputy DSL understand the unique risks associated with online safety. They have the relevant knowledge and up to date capability required to keep vulnerable adults safe whilst they are online at the College.

10.2 The DSL and Deputy DSL are able to recognise the additional risks that vulnerable adults with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and have the capability to support SEND students to stay safe online.

10.3 All members of College staff are trained in and receive regular updates about online safety and recognising and reporting concerns.

10.4 The College's Acceptable Use Policy recognises that internet safety is a whole College responsibility (staff, students, directors, volunteers and parent carers).

10.5 Vulnerable adults may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some vulnerable adults may find themselves involved in activities which are inappropriate or possibly illegal. The College therefore recognises the responsibility to educate its students, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.

10.6 The College ensures that filters are in place to prevent access to unsuitable sites and monitor the use of the College's network and internet to ensure that any student or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported. The RM Safety net and E safety is used for this purpose.

10.7 Whilst it is essential that Victoria College ensures that appropriate filters and monitoring systems are in place, there is flexibility (through the set-up of RM safety net and E-Safe, the college's IT provider) to prevent "over blocking" leading to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding.

11 Supporting Vulnerable adults

11.1 College staff are made aware of the fact that many of the students at the College, because of their learning and/or physical disability, are vulnerable and may find it more difficult to recognise and report abuse. The College, therefore, recognises that it must take particular care, when working with vulnerable adults with disabilities. Reasons for this particular vulnerability are described in Appendix H.

11.2 College staff recognise that vulnerable adults who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. Staff are aware that research shows that, at the College, the behaviour of these vulnerable adults may be challenging and defiant or they may be withdrawn.

11.3 Staff acknowledge that the College may be the only stable, secure and predictable element in the lives of vulnerable adults who have been abused or who are at risk of harm.

11.4 College staff will endeavour to support all students by:

- Encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour;
- Promoting a positive, supportive and secure environment giving vulnerable adults a sense of being valued;
- Consistently applying the behaviour policy which is aimed at supporting vulnerable adults.
- Ensuring that students know that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;
- Liaising with other agencies that support vulnerable adults such as social care and mental health services;
- Notifying Social Care Services immediately there is a significant concern;
- Providing continuing support to a student about whom there have been concerns who leaves the College by ensuring that appropriate information is forwarded under confidential cover to the students' new setting.

12 Special Educational Needs and Disability (SEND)

- 12.1 Staff recognise that vulnerable adults with special educational needs and disabilities can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration;
 - Being more prone to peer group isolation than other vulnerable adults;
 - Assumptions that state approved care-givers are providing safe care for the young person
 - Being disproportionately impacted by behaviours such as bullying without outwardly showing any signs; and
 - Communication barriers and difficulties in overcoming these barriers
- 12.2 It is recognised that students, due to their learning disability and possible related conditions and needs will rely on staff to provide basic care needs along with support for communication and learning. This puts students in a less powerful position than staff and as a result are more likely to experience abuse than other young people.
- 12.3 College staff always consider extra pastoral support for vulnerable adults with SEND to address these additional challenges.

13 Mental Health

- 13.1 All staff are aware that mental health problems can, in some cases, be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation.
- 13.2 Where students have suffered abuse and neglect, or other potentially traumatic adverse experiences, this can have a lasting impact into adulthood. It is key that staff are aware of how these experiences can impact on their mental health, behaviour and education.
- 13.3 Whilst it is acknowledged that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, college staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 13.4 If staff have a mental health concern about a student that is also a safeguarding concern, they are aware that immediate action should be taken, following the safeguarding policy and speaking to the designated safeguarding lead or a deputy without delay.

14 Contextualised Safeguarding

- 14.1 All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between students outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) are aware that they need to consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and vulnerable adults can be vulnerable to

multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

15 Positive Physical Intervention / Use of Reasonable Force

- 15.1 There are circumstances when it is appropriate for staff in college to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.
- 15.2 The College's policy on positive physical intervention is set out in the Reducing Physical Intervention Procedure and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property.
- 15.3 College staff acknowledge that when applying reasonable force in response to risks presented by incidents involving students with SEN or disabilities or with medical conditions, it is important to recognise their additional vulnerability and to make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.
- 15.4 College staff understand that physical intervention of a nature that causes injury or distress to a young person may be considered under disciplinary procedures.
- 15.5 College staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach technique. All incidences of physical intervention will be recorded in accordance with the Team Teach recommended procedures.
- 15.6 The College recognises that touch is appropriate in the context of working with students with complex needs who require high levels of personal care and supervision and all staff have been given 'safe working practice' guidance to ensure they are clear about their professional boundaries. College staff recognise that the adoption of a 'no contact' policy could leave them unable to fully support and protect the students in their care.

16 Record Keeping, Monitoring and Transfer

- 16.1 Any member of staff receiving a disclosure of abuse from a young person, or noticing signs or symptoms of possible abuse, completes an on-line incident form (via MyConcern), as soon as possible and certainly before the end of the working day, noting exactly what was said, using the young person's own words as far as possible. MyConcern automatically times and dates the incident as well as the name of the member of staff submitting it.
- 16.2 All records of a safeguarding nature are forwarded, via MyConcern, to the DSL. The DSL will also be verbally informed that they will be receiving an alert.
- 16.3 Access to safeguarding information in MyConcern can only be accessed via a two factor authentication system by staff with the appropriate level of access assigned to them by the MyConcern administrator. MyConcern maintains a complete record of who has accessed an individual's file and when this occurred.
- 16.4 Any referrals made to other agencies, including referrals to Social Care, are copied prior to sending and stored in the young person's file on MyConcern.
- 16.5 The DSL maintains and regularly audits the safeguarding records on MyConcern, ensuring that each file includes a chronology of significant events and that information and contact details are accurate and up-to-date.
- 16.6 The DSL transfers students safeguarding records in a safe and timely manner when a young person moves to a different setting, ensuring that a receipt of transfer is obtained. (See Appendix J)

- 16.7 The DSL may retain an archived copy of the student's safeguarding records generated by the College prior to transfer and retain for as long as is necessary (normally DOB + 25 years), where there is justification for believing that the records may be required as evidence of the College's involvement with the student for statutory purposes (e.g. court cases). When the records are no longer required, they will be deleted/securely disposed of.
- 16.8 A record of any allegations (proven) made against staff is kept in a confidential file by the Head of College and held for a period of 6 years.

17 Information Sharing & Confidentiality

- 17.1 Information sharing is vital in identifying and tackling all forms of abuse. All College staff are made aware that they have a professional responsibility to share information with other agencies in order to safeguard vulnerable adults.
- 17.2 All personal information will be processed fairly and lawfully in line with the College's duties under the Data Protection Act 2018 and GDPR and will be held safely and securely. However, College staff recognise that this is not a barrier to sharing information where the failure to do so would result in a student being placed at risk of harm.
- 17.3 College staff recognise that all matters relating to the safeguarding of vulnerable adults are confidential. The DSL or the Deputy DSL will disclose any information about a young person to other members of staff on a need to know basis only.
- 17.4 All College staff are made aware that they cannot promise a student that they will keep secrets which might compromise their safety or well-being.
- 17.5 When a student about whom concerns have been raised and recorded leaves the College, the DSL will consider if it would be appropriate to share information with any new setting in advance of the student leaving to ensure that support is in place for when he/she arrives.

18 Communication with Parent Carers

- 18.1 College staff recognise that good communication with parent carers is crucial in order to safeguard and promote the welfare of vulnerable adults effectively.
- 18.2 The College will always undertake appropriate discussion with parent carers prior to involvement of another agency unless to do so would place the student or an adult at further risk of harm or would impede a criminal investigation.
- 18.3 The College will ensure that parent carers have an understanding of the responsibilities placed on the College and staff to safeguard vulnerable adults and their duty to co-operate with other agencies in this respect. This is achieved through newsletters and information on the College's website.

19 Supporting and Supervision of Staff

- 19.1 It is recognised that staff working in the College who have become involved with a student who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
- 19.2 The Head of College will support such staff by providing an opportunity to talk through their anxieties with herself or the DSL and to seek further support such as counselling or regular supervision, as appropriate.
- 19.3 In order to reduce the risk of allegations being made against College staff, and ensure that staff are competent, confident and safe to work with vulnerable adults, they are made aware of safer working practice guidance and are given opportunities, in training, to develop their understanding of what constitutes safe and unsafe behaviour.

20 Safer Recruitment and Selection of Staff

- 20.1 Victoria College has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

- 20.2 The recruitment process is robust in seeking to establish the commitment of candidates to support the College's measures to safeguard vulnerable adults and to identify, deter or reject people who might pose a risk of harm to vulnerable adults or are otherwise unsuited to work with them.
- 20.3 References are requested and scrutinised for all candidates prior to interview and any discrepancies or concerns are raised and discussed during interview, including for any volunteers and internal candidates. References are always requested directly from the referee and verified as being from a senior person with appropriate authority; electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient information is provided, the referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee.
- 20.4 All staff working within the College have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory, enhanced DBS check (including barred list check) and a right to work in the UK. For members of staff who remain employed at the College, the check will be repeated every four years.
- 20.5 All qualified teachers working within the College have been checked using the Teacher Services website to ensure they have been awarded QTS, they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions e.g. management posts. Unqualified teachers are checked for any prohibitions, sanctions or restrictions using the Teaching Regulation Agency website.
- 20.6 Victoria College seeks written assurance from supply and third-party agencies, alternative providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with students.
- 20.7 All directors are subject to the minimum of an enhanced DBS check without barred list check. Barred lists checks are made for directors who also work in the main College
- 20.8 The College maintains a single central record of recruitment checks for audit purposes.
- 20.9 Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and is subject to a risk assessment.
- 20.10 Volunteers who are working in regulated activity will be supervised at all times. A risk assessment will be undertaken to help decide whether or not an enhanced DBS check, without barred list check, is required.

21 Allegations against staff / Abuse of Position of Trust (Appendix I)

- 21.1 Victoria College is mindful of the position of trust that staff are in when working within an education setting. College staff recognise this and acknowledge that it could be considered a criminal offence to abuse that trust.
- 21.2 The College acknowledges that a student may make an allegation against a member of staff or volunteer. The college will respond robustly when concerns are raised or complaints made as it recognises that this promotes a safer environment and we seek to learn from complaints and comments. The college will take action and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible. The college's complaints procedures are available from the admin office and on the website
- 21.3 If such an allegation is made, the member of staff receiving the allegation is expected to immediately inform the Head of College, unless the allegation concerns the Head of College, in which case the Chair of Directors will be informed immediately.
- 21.4 The Head of College(or Chair of Directors) on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO), prior to undertaking any investigation.

- 21.5 The College will follow the DfE, West Midlands Safeguarding Adults and Local Authority procedures for managing allegations against staff, LADO contacts are available on the website for Birmingham, Worcestershire and Dudley Local Authorities.
- 21.6 It is essential that any allegation of abuse made against a member of staff or volunteer in college is dealt with very quickly, in a fair and consistent way that provides effective protection for the student and, at the same time supports the person who is the subject of the allegation.
- 21.7 The college recognises that it also has a duty of care to their employees. As such, effective support will be provided for anyone facing an allegation and they will be given a named contact if they are suspended.
- 21.8 Publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law; this includes verbal conversations or written material including content placed on social media sites.

22 Complaints or Concerns expressed by Students, Parent Carers, Staff or Volunteers

- 22.1 The College recognises that listening to students is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual student will be listened to and acted upon in order to safeguard his/her welfare.
- 22.2 College staff will seek to ensure that the student or adult who makes a complaint is informed not only about the action the College will take but also the length of time that will be required to resolve the complaint. The College will also endeavour to keep the student or adult regularly informed as to the progress of his/her complaint.

23 Whistleblowing

- 23.1 College staff recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.
- 23.2 Staff are made aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the Confidential Reporting (Whistleblowing) policy.
- 23.3 Whistleblowing concerns about the Head of College should be raised with the Chair of Directors.

24 Photography and use of images (including handheld devices)

- 24.1 The welfare and protection of students at the College is paramount and consideration is always given to whether the use of photography will place them at risk. It is recognised that images may be used to harm vulnerable adults, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.
- 24.2 For this reason consent is always sought when photographing students using any means and including iPads, smart phones or cameras and additional consideration is given to photographing vulnerable adults, particularly those known to be fleeing domestic violence. Consent is sought directly from the young person if they are able to provide this or from their parent carer if, as a result of their learning difficulties, they are unable to do so.
- 24.3 Many vulnerable adults own or have access to handheld devices and they are encouraged to consider measures to keep themselves safe when using the internet and social media at home and in the community. Parent Carers who continue to support vulnerable adults as a result of their learning difficulties are also advised as necessary.
- 24.4 Only iPads, smart phones and cameras that are owned by the College are used for photographs. Staff are asked never to use personal devices.

25 Staff/Student Relationships

- 25.1 The College provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students. Staff found to be in breach of these rules may be subject to disciplinary action or a safeguarding investigation.

- 25.2 Staff/Student relationships are governed by the Staff Code of Conduct which all staff are required to read.
- 25.3 Any relationship between a staff member and student outside of the college i.e. in a paid or unpaid capacity must be declared by the staff member to a manager in order to discuss appropriate working conditions that do not compromise confidentiality or rights of the student and avoid a conflict of interest on behalf of the staff member.
- 25.4 Staff must not engage in any personal, sexual relationship with a student in line with the Sexual Offences Act 2003. This is illegal and would constitute immediate disciplinary action

26 Health & Safety

- 26.1 The College's Health & Safety policy, set out in a separate document, reflects the consideration given to the safeguarding of vulnerable adults both within the College and when off-site, for example when undertaking trips and visits.
- 26.2 Risk assessments are undertaken and reviewed regularly, in respect of site security, the risk of students being drawn into terrorism or exposed to extremist behaviour, and the risk to and from students displaying harmful behaviour.

27 Safe Environment

- 27.1 The College undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.
- 27.2 The College has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of College hours.
- 27.3 Visitors to the College, for example visiting speakers or curriculum specialists, are appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material. This includes any necessary research by the organiser of the visit, ID checks on arrival at the College and supervision, whilst on site, by a member of staff.

28 Challenge and Escalation

- 28.1 The College recognises that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard vulnerable adults.
- 28.2 As part of the College's responsibility for safeguarding, it is acknowledged that staff must be prepared to challenge each other if it is felt that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the students and promoting their welfare.
- 28.3 The College is aware of the escalation procedures for raising concerns in respect of poor practice and recognises the responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of the vulnerable adults at the College.

29 Inspection

- 29.1 Since September 2019, Ofsted's inspections of early years, schools and post-16 provision are carried out under Ofsted's Education Inspection Framework. Inspectors will always report on whether or not arrangements for safeguarding students are effective. In addition to the framework and inspections handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: Inspecting safeguarding in early years, education and skills settings.
- 29.2. The college pays full regard to all relevant Ofsted guidance.

30 Monitoring and Evaluation

- 30.1 This Safeguarding policy and procedures will be monitored and evaluated by:
- Completion of an annual safeguarding audit

- Completion of a termly safeguarding report to the Directors;
- Surveys and questionnaires from the vulnerable adults and their parent carers;
- Discussions with vulnerable adults and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the College's single central record of recruitment checks;
- Scrutiny of Directors minutes;
- Monitoring of logs of bullying/racist/behaviour incidents and PPI records;
- Supervision of staff involved in safeguarding the vulnerable adults at the College;
- Case file audits undertaken by the DSL

31 Other Relevant Policies

31.1 The Director's statutory responsibility for safeguarding the welfare of vulnerable adults goes beyond basic safeguarding procedures.

31.2 The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, including:

- Staff Code of Conduct
- Behaviour, Exclusions, Liberty Safeguarding and Positive Physical Intervention
- Mental Capacity & Consent
- Anti-Bullying and Harassment
- Manual Handling
- Educational Trips
- Work Related Learning
- Health and Safety
- Intimate Care
- Healthy Relationships
- Equality and Diversity
- Online safety
- Whistleblowing (Confidential Reporting)

31.3 The above list is not exhaustive but when undertaking development or planning of any kind College staff will need to consider safeguarding matters

32 Contacts: If a student or staff member is in severe danger call 999.

External Birmingham	Birmingham Safeguarding Adult Board	01213031234 csadultsocialcare@birmingham.gov.uk
	Local Authority Designated Officer:	01216751669 ladoteam@birminghamchildrenstrust.co.uk
External Worcestershire	Worcestershire Adult Safeguarding Board	safeguardingadultsbo@worcestershire.gov.uk SWilks@worcestershire.gov.uk 01905768053 Safeguardingworcestershire.org.uk/report-it/

	Local Authority Designated Officer:	01905 846221 lado@worcschildrenfirst.org.uk
External Dudley	Dudley Safeguarding People Partnership MASH	03005550055 Out of Hours 03005558574 MASH-referrals@dudley.gov.uk
	Local Authority Designated Officer:	01384813110 allegations@dudley.gov.uk

Other contacts	Ofsted	Tel: 0300 123 1231
	Women's Aid (24hr. Helpline)	Tel: 0800 980 3331
	West Mercia Rape and Sexual Abuse Support Centre (WMRSASC)	Tel: 01905 724514
	Rape crisis	Tel: 0808 802 9999

Appendices

- a) Signs and symptoms of abuse
- b) Sexual Exploitation
- c) Criminal Exploitation/County Lines
- d) Effects of Domestic Abuse
- e) Extremism and Radicalisation
- f) Female Genital Mutilation
- g) Forced Marriage
- h) Vulnerable adults with a Disability
- i) Checklist for handling and recording allegations or complaints made against a member of staff or volunteer
- j) Transfer Record Sheet

Appendix A - Signs and Symptoms of Abuse

Recognition & Identification of Abuse

What is abuse?

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Indicators of Abuse

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing the circumstances of any individual any of these indicators should be viewed within the overall context of the young person's individual situation including any disability.

EMOTIONAL ABUSE

Emotional Abuse is the persistent emotional maltreatment of a individual such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to vulnerable adults that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature developmentally inappropriate expectations being imposed on vulnerable adults. These may include interactions that are beyond the individual's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them from participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing an individual frequently to feel frightened or in danger, or the exploitation or corruption of vulnerable adults.

Emotional abuse is difficult to:

- define
- identify/recognise
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-deprecation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism
- Extremes of passivity or aggression
- Vulnerable adults suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for them to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present

NEGLECT

Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may involve a parent carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), failing to protect an individual from physical and emotional harm or danger, failure to ensure adequate supervision (including the use of inadequate care-givers) or failure to ensure access to appropriate medical care or treatment.

Neglect can often fit into various forms which are:

- Medical – the withholding of medical care including health and dental.
- Emotional – lack of emotional warmth, touch and nurture
- Nutritional – either through lack of access to a proper diet which can affect their development.

- Physical – failure to meet the individual’s physical needs
- Lack of supervision and guidance – meaning the vulnerable adult is in dangerous situations without the ability to assess the danger.

College staff need to consider both acts of *commission* (where a carer deliberately neglects the vulnerable adult) and acts of *omission* (where a carer’s failure to act is causing the neglect).

Many of the signs of neglect are visible. However College staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a student is being neglected. Students spend considerable time in the College so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

Physical signs:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- Poorly clothed, with inadequate protection from the weather
- Signs of malnutrition include wasted muscles and poor condition of skin and hair.
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs including any additional support the young person may need as a result of any disability

Behavioural signs:

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- Absence for no apparent reason
- Difficult or challenging behaviour

PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an individual. Physical harm may also be caused when a carer fabricates the symptoms of or deliberately induces illness.

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the police and/or social care in order to safeguard the vulnerable adult.

Staff must be alert to:

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern

Physical signs:

- Bald patches
- Bruises, black eyes and broken
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns
- Bruising
- Bite marks may be evident from an impression of teeth
- Small circular burns on the skin suggest cigarette burns

- Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
- Red lines occur with ligature injuries

Behavioural signs:

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive
- Fear of suspected abuser being contacted
- Injuries that the individual cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

SEXUAL ABUSE

Sexual Abuse involves forcing or enticing an individual to take part in sexual activities, not necessarily involving a high level of violence, whether or not he/she is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving vulnerable adults in looking at or in the production of, sexual images, watching sexual activities, encouraging vulnerable adults to behave in sexually inappropriate ways, or grooming a in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Characteristics of sexual abuse:

- It is usually planned and systematic – people do not sexually abuse vulnerable adults by accident, though sexual abuse can be opportunistic;
- Grooming the individual – people who abuse vulnerable adults take care to choose a particular individual and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites;
- Grooming the individual's environment – abusers try to ensure that potential adult protectors (carers) are not suspicious of their motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.

Behavioural changes may include:

- Being overly affectionate - desiring high levels of physical contact and signs of affection such as hugs and kisses
- Lack of trust or fear of someone they know well
- They may start using sexually explicit behaviour or language,
- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism

- Genital discharge or urinary tract infections
- Marked changes in the young person's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically
- The young person may refuse to attend the College or start to have difficulty concentrating so that their work is affected
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
- The young person may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person
- Vulnerable adults who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

Physical signs and symptoms for any age young person could be:

- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Stomach pains or discomfort walking or sitting
- Sexually transmitted infections
- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
- Soreness, itching or unexplained bleeding from penis, vagina or anus
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy

Appendix B - Sexual Exploitation

Sexual exploitation is a form of abuse which involves individuals (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity.

'Sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive another individual 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. Sexual exploitation does not always involve physical contact; it can also occur through the use of technology.'

Who is at risk?

Sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable, males are also victims of this type of abuse.

The characteristics common to all victims of sexual exploitation are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between vulnerable adults.

WARNING SIGNS AND VULNERABILITIES CHECKLIST¹

The evidence available points to several factors that can increase an individual's vulnerability to being sexually exploited:

- Living in a chaotic or dysfunctional household
- History of abuse
- Recent bereavement or loss
- Gang association either through relatives, peers or intimate relationships
- Attending settings with individuals who are sexually exploited
- Learning disabilities
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families
- Friends with other individuals who are sexually exploited
- Homeless
- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation
- Low self-esteem or self-confidence

The following signs and behaviour are generally seen in vulnerable adults who are **already being sexually exploited**:

- Missing from home
- Physical injuries
- Drug or alcohol misuse
- Involvement in offending
- Repeat sexually-transmitted infections, pregnancy and terminations
- Absent from college
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- Estranged from their family
- Receipt of gifts from unknown sources
- Recruiting others into exploitative situations
- Poor mental health
- Self-harm
- Thoughts of or attempts at suicide

Evidence shows that any individual displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation.

The DSL must ensure that all staff are aware of signs and symptoms of sexual exploitation and know that these must be reported and recorded as safeguarding concerns.

Appendix C –Criminal Exploitation/County Lines

CE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a person into any criminal activity:

- In exchange for something the victim needs or wants and/or
- For the financial or other advantage of the perpetrator or facilitator and/or
- Through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual.

CE does not always involve physical contact; it can also occur through the use of technology.

CE can include the person being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CE:

- Unexplained gifts or new possessions;
- Association with other young people involved in exploitation;
- Changes in emotional well-being;
- Misuse of drugs and alcohol;
- Missing for periods of time or regularly come home late; and
- Regularly miss or do not take part in education.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Vulnerable adults can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children's homes and care homes.

Vulnerable young adults are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. People can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and education), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ should be considered. If a person is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of involvement in county lines is available in guidance published by the Home Office.

Appendix D - Effects of domestic abuse on vulnerable adults

The impact of domestic abuse on the quality of an individual's life is very significant. Vulnerable adults who live with domestic abuse are at increased risk of behavioural problems, emotional trauma, and mental health difficulties.

The impact of domestic abuse on vulnerable adults can be wide-ranging and may include effects in any or all of the following areas:

Physical

Individuals can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour, or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

Sexual

There is a high risk that vulnerable adults will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops and this creates a climate in which sexual abuse could occur. In addition to this, vulnerable adults may sometimes be forced to watch the sexual abuse of their carer. This can have long-lasting effects on the sexual and emotional development of the individual.

Economic

The carer of the vulnerable adult may have limited control over the family finances. Therefore, there might be little or no money available for social activities, clothing or even food, impacting on their health and development.

Emotional

Vulnerable adults will often be very confused about their feelings. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many vulnerable adults feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some vulnerable adults may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

Isolation

Vulnerable adults may become withdrawn and isolated; they may not be allowed out; and if there is abuse in the home they are less likely to invite their friends around. Education may be disrupted in many ways, and this may contribute to their growing isolation. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

Threats

Vulnerable adults are likely to have heard threats to harm their carer. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

What you might see in the College

- Unexplained absences or
- Vulnerable adults attending the College when ill rather than staying at home;
- Vulnerable adults who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home;
- Vulnerable adults displaying difficulties in their cognitive and educational performance;
- Vulnerable adults whose behaviour and personality changes dramatically;
- Vulnerable adults who become quiet and withdrawn and have difficulty in developing positive peer relations;
- Vulnerable adults displaying disruptive behaviour or acting out violent thoughts with little empathy for victims;
- Vulnerable adults who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

What the College can do

The College can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.

For many victims, the College might be the one place that they visit without their abusive partner. Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which power is used to exert control over others. The underlying attitudes which legitimise and perpetuate such violence should be challenged by educational trusts as part of the whole educational trust ethos.

Victoria College can support individual vulnerable adults by:

- Introducing a **whole-College philosophy** that domestic abuse is unacceptable;
- **Responding to disclosures** and potential safeguarding concerns
- **Giving emotional support** – the individual might need referral to a more specialist service or need additional support
- **Facilitating a peer support network** – vulnerable adults can become isolated but often welcome talking to friends about their problems;
- **Offering practical support;**
- **Providing somewhere safe and quiet;**
- **Improving the self-esteem and confidence** of vulnerable adults by:
 - offering them opportunities to take on new roles and responsibilities;
 - offering tasks which are achievable and giving praise and encouragement;
 - monitoring their behaviour and setting clear limits;
 - criticising the action, not the person;
 - helping them to feel a sense of control in their educational trust lives;
 - involving them in decision making;
 - helping them to be more assertive;
 - respecting them as individuals;
 - encouraging involvement in extra-curricular activities.

(From the Expect Respectful education Toolkit – Women’s Aid)

Appendix E – Radicalisation and Extremism

The Prevent Duty

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Preventing Radicalisation

Vulnerable adults are vulnerable to extremist ideology and radicalisation. Similar to protecting vulnerable adults from other forms of harms and abuse, protecting them from this risk should be a part of the College's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

What is Prevent?

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including colleges, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping vulnerable adults safe by:

- Ensuring a broad and balanced curriculum is in place to promote the spiritual, moral, social and cultural development of students;
- Assessing the risk of vulnerable adults being drawn into extremist views;
- Ensuring safeguarding arrangements by working in partnership with local authorities, police and communities;
- Training staff to provide them with the knowledge and ability to identify vulnerable adults at risk;
- Keeping vulnerable adults safe online, using effective filtering and usage policies.

Warning Signs/Indicators of Concern

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

There is no single way of identifying whether a young adult is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in behaviour, which could indicate that they may be in need of help or protection.

Vulnerable adults may become susceptible to radicalisation through a range of social, personal and environmental factors. It is vital that College staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all vulnerable adults experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Factors which may make students more vulnerable may include:

- **Identity Crisis:** the individual is distanced from their cultural/religious heritage and experiences discomfort about their place in society.

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

Students who are vulnerable to radicalisation may also be experiencing:

- Substance and alcohol misuse
- Pressure
- Influence from other people or via the Internet
- Bullying
- Domestic violence
- Race/hate crime

Behaviours which may indicate a student is at risk of being radicalised or exposed to extremist views could include:

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Accessing extremist material online, including through social networking sites;
- Possessing or accessing materials or symbols associated with an extremist cause;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Significant changes to appearance and/or behaviour increasingly Colleges on an extremist ideology, group or cause;
- Changing their style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause;
- Using insulting to derogatory names for another group;
- Increase in prejudice-related incidents committed by that person – these may include:
 - Physical or verbal assault
 - Provocative behaviour
 - Damage to property
 - Derogatory name calling
 - Possession of prejudice-related materials
 - prejudice related ridicule or name calling
 - Inappropriate forms of address
 - Refusal to co-operate
 - Attempts to recruit to prejudice-related organisations
 - condoning or supporting violence towards others

Referral Process

All concerns about vulnerable adults vulnerable to radicalisation should be referred to the SPOC in the first instance. The SPOC will follow safeguarding procedures including:

- Talking to the individual about their behaviour/views/on-line activity/friends etc.
- Discussion with parent carers about the concerns;
- Checking out on-line activity, including social media if possible;
- Providing in-house support, if available;

If concerns persist, then the SPOC should complete the Channel Referral Form normally with the knowledge and consent of the individual.

The referral will then be subject to a triage process to decide whether or not it meets the threshold for a referral to Channel. If it does, the SPOC should be prepared to attend the Channel Panel meeting to share the concerns and help identify any intervention required. Further feedback to the Channel Panel will be expected following intervention to decide whether there are still concerns.

Additional Guidance

Guidance on Channel is available at: Channel guidance.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support teachers, tutors and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help college staff identify and address the risks, as well as build resilience to radicalisation.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

Government's Counter Extremism Strategy, <https://www.gov.uk/government/publications/counter-extremism-strategy>.

Revised Prevent Duty Guidance for England and Wales, <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>.

The Terrorism Act 2000 (TACT 2000), <http://www.legislation.gov.uk/ukpga/2000/11/contents>

Appendix F – Honour Based Abuse - Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) – a form of Human Rights Abuse

What is FGM?

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

Type 1 – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)

Type 2 – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the ‘lips’ that surround the vagina)

Type 3 – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris

Type 4 – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as ‘female genital cutting’ or female circumcision. Communities tend to use local names for this practice, including ‘sunna’.

Why is FGM carried out?

It is believed that:

- It brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage.
- It preserves a girl’s virginity/chastity.
- It is part of being a woman as a rite of passage.
- It upholds the family honour.
- It cleanses and purifies the girl.
- It gives the girl and her family a sense of belonging to the community.
- It fulfils a religious requirement believed to exist.
- It perpetuates a custom/tradition.
- It helps girls and women to be clean and hygienic.
- It is cosmetically desirable.
- It is mistakenly believed to make childbirth safer.

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them ‘a better Muslim’. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Within which communities is FGM known to be practised?

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM. UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leone, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parent carers will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parent carers to follow what is seen as a cultural or religious practice.

Is FGM harmful?

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young

woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

Is it illegal?

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004:

The act makes it illegal to:

- practise FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country
- Aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

Signs, symptoms and indicators

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- a child or young person talking about getting ready for a special ceremony
- a family arranging a long break abroad
- a child's or young person's family being from one of the 'at-risk' communities for FGM (see above)
- knowledge that an older sibling has undergone FGM
- A young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child or young person has undergone FGM:

- prolonged absence from college or other activities
- behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still, and looking uncomfortable
- complaining about pain between their legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinary tract infection
- Disclosure.

It is important to keep in mind that the parent carers may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parent carers from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parent carers feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

The 'one chance' rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parent carers who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so

threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

Appendix G – Forced Marriage

Forced Marriage is a form of Domestic Abuse and a crime in England and Wales

Forced Marriage should be recognised as a human rights abuse – and should always invoke young person protection procedures within the educational trust.

A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

Warning signs

Warning signs can include a sudden drop in performance, absence and conflicts with parent carers over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

The justifications

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon — there have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parent carers who force their vulnerable adults to marry often justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

Culture

Often parent carers believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parent carers come under significant pressure from their extended families to get their vulnerable adults married.

The law

Although there is no specific criminal offence of 'forcing someone to marry' within England and Wales, forced marriage may involve criminal offences. Perpetrators — usually parent carers or family members — could be prosecuted for offences including: threatening behaviour, assault, kidnap, abduction, imprisonment and in the worse cases murder.

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

What to do if a student seeks help

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to social care, you will need to consider whether to respect the student's wishes — or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform them.

- Establish whether there is a family history of forced marriage — i.e. siblings forced to marry.
- Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Liaise with Police and social care to establish if any incidents concerning the family have been reported.
- Refer to the local police if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

What to do if the student is going abroad imminently

The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the student and to repatriate her:

- a photocopy of the student's passport for retention — encourage her to keep details of her passport number and the place and date of issue
- as much information as possible about the family (this may need to be gathered discretely)
- full name and date of birth of student under threat
- student's father's name
- any addresses where the student may be staying overseas
- potential spouse's name
- date of the proposed wedding
- the name of the potential spouse's father if known
- addresses of the extended family in the UK and overseas

Specific information

It is also useful to take information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission — in case another person of the same age is produced pretending to be the student.

Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student — a secret mobile telephone, for example, that will function abroad.

Forced marriage: what educators should not do?

- treat such allegations merely as domestic issues and send the student back to the family home
- ignore what the student has told you or dismiss the need for immediate protection
- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- contact the family in advance of any enquires by the Police, Vulnerable adult's Services or the Forced Marriage Unit, either by telephone or letter
- share information outside young person protection information sharing protocols without the express consent of the student
- breach confidentiality except where necessary in order to ensure the student's safety
- attempt to be a mediator

Schools and colleges can play an important role in safeguarding against forced marriage. The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, pages 35-36 of which focus on the role of schools and colleges.

Further guidance is available from The Forced Marriage Unit:

Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday

Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500

E-mail: fmufco.gov.uk **Website:** www.fco.gov.uk/forcedmarriage

FMU publication: '*Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage*' June 09

See also: '*The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage*' Government Office - November 2008, West Mercia regional procedures and Forced Marriage Guidance on the WSCB website – January 2016.

Appendix H - Vulnerable adults with a Disability

Some students, because of their learning and/or physical disability, are vulnerable and may find it more difficult to recognise and report abuse.

Their disability may mean that:

- Their life experiences are limited, creating difficulty recognising inappropriate behaviour.
- They are afraid of challenging people, concerned that they will anger an authority figure or get into trouble.
- Communication difficulties make it hard to report abuse.
- They may not be able physically to leave an abusive situation.
- They receive intimate physical care and, therefore, the abuse may seem 'normal'.
- Their self-esteem and self-image are poor.
- They might not be aware to whom they can report abuse.
- Authority figures are unwilling to believe that anyone would abuse a disabled young person.

The Victoria College must take particular care, therefore, when working with vulnerable adults with disabilities.

**Appendix I
VICTORIA COLLEGE**

**Checklist for handling and recording allegations or complaints made against a member of staff or
volunteer**

- 1.** Name and position of member of staff who is subject of allegation/complaint:
.....
- 2.** Is the complaint written or verbal?
- 3.** Complaint made by: Relationship to young person:
- 4.** Name of young person:..... Age and DOB.
- 5.** Parent Carers' name and address:
.....
.....
- 6.** Date of alleged incident/s:
- 7.** Did the young person attend on this/these dates?
- 8.** Nature of the complaint (continue on a separate sheet if necessary):.....
.....
.....
.....
.....
.....
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.....
.....
- 9.** Other relevant information:.....
.....
.....
.....
.....
.....
- 10.** LADO contacted: Yes No
- 11.** In no, reason why not

.....
12. Further actions advised by Senior Adviser/LADO:

.....
.....
.....
.....

Checklist **Yes** **No**

- Do you have details (either a written account or notes from a verbal account) of the alleged incident, signed and dated?
- Have you checked the incident could actually have taken place (I.e. was the young person in the lesson; was the member of staff teaching the lesson that day)?
- Is there evidence of significant harm – e.g. a visible injury?
- Has a criminal offence taken place – e.g. has excessive force been used, that could be classed as an assault?
- Has the incident been reported to anyone else – e.g. the Police?
- Were there any witnesses to the incident – if so have you made a note of names?
- Are parent carers aware of the allegation?
- Is the member of staff aware of the allegation?
- Have you reported the allegation to the Senior Adviser for Safeguarding Vulnerable adults in Education (01905 728902) or LADO (01905 752816)?

Remember, do not attempt to investigate the allegation yourself.

Your name and position:

Signature:..... **Date:**

Appendix J Transfer of Records

Student Safeguarding Record Transfer Receipt

Students Name	
Date of Birth	
Home Address	
Receiving Educational Setting	
Address	
<p>I confirm transfer of young person safeguarding records in respect of the above named student and that a copy of all Victoria College based documents has been retained by Victoria College</p> <p>Signed on behalf of Victoria College:</p> <p></p> <p>Print Name: Caroline Lane</p> <p>Date: 8 July 2021</p>	
<p>I confirm receipt of young person protection records in respect of the above named young person</p> <p>Signed on behalf of receiving setting:</p> <p>Print name:</p> <p>Date:</p>	
<p>Please copy and retain the original at Victoria College</p>	