



Title	Safeguarding Policy & Procedures
Owner	Andrew Barnard (Lead Designated Safeguarding Officer and Quality Manager)
Review interval	Annually or sooner if there is a change in rules, regulations, or procedure
Date of last review	07/01/2022

Updates		
Every review will not necessarily yield any changes if none are needed. There will only be comments below if a change was made		
Date	Version no.	Comments
03/06/20	1	
18/12/20	1.1	Minor text corrections for consistency
09/02/21	1.2	Added reference to Keeping Children Safe in Education guidance P5
22/07/21	1.3	Clarified information sharing (Flow chart P11) Update process charts – How to deal with concerns Reorganised order of some sections for easier reference
07/01/22	1.4	Added points of referral for Prevent Co-ordinators Added detail about signs of radicalisation / extremist behaviour

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Contacts		
Role	Name	Contact details
Lead Designated Safeguarding Officer (LDSO)	Andrew Barnard	07477 808337
Designated Safeguarding Officer (DSO)	Annette Hall	07463 803297
During office hours (9am - 5.30pm) support can also be sought by contacting 01773 829121		

Where the following policy and procedure refers to DSO, this means any of the above-named Grey Seal Academy staff members



This Safeguarding Policy should be read in conjunction with the safeguarding guidance document and the following policies:

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

Other Grey Seal Academy policies may additionally reference procedures that support Safeguarding and Prevent duties.

Scope

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

Intent

Grey Seal Academy believes that:

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

What is Safeguarding?

Whereas “Child Protection” looks at recognising abuse and neglect and acting on it - “Safeguarding” looks at keeping young people and vulnerable adults at risk safe from a much wider range of potential harm, whether from crime, other forms of abuse or from being drawn into terrorism-related activity and looks at preventative action, not just reaction.

Several high-profile cases including the Soham murders of 2001, and the Baby P tragedy and the more recent Westminster Attacks and Manchester attacks are painful reminders of the importance of safeguarding. Although preventative measures are never infallible, there remains a pressing responsibility to ensure that the most robust safety network possible is in place where young people and adults at risk are concerned.



Ignoring abuse is not an option

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

Purpose:

This policy has been developed to:

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

To achieve this, Grey Seal Academy will:

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



Responsibilities

This policy has been developed to:

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

Grey Seal Academy's Lead Designated Safeguarding Officer has the responsibility for Safeguarding. Grey Seal Academy's Senior Management Team will be involved regarding all Apprenticeship Safeguarding Policy updates.

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

The duties of the Managing Director and Senior Management Team are to ensure that:

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

The duties of a Designated Safeguarding Officer are to ensure that

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

In addition, the duties of the Lead Safeguarding Officer are to ensure that:

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



Promotion of Policy

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

To Staff:

- New staff inductions
- Undertaking professional development at least annually such as qualifications and internal training
- Read and review this Policy regularly, at least annually as part of professional development activities
- The LDSO will update and train staff on any changes to this policy as they are made
- Awareness raising through regular discussions including making safeguarding a standard agenda item in meetings
- Share current affairs, topics and events that might form useful discussion with Learners

To Learners:

- Making the subject part of programme inductions and reference resources such as the Learner Welcome Pack
- Embed topics of Safeguarding, British Values, Prevent, Equality, safety and wellbeing in training resources, discussions and learning activities
- By reviewing awareness and understanding during Tripartite progress reviews

To Employers

- Client Relationship Manager discusses with employers during initial engagement stages
- The employer is sent programme guides which include details of relevant policies and processes, including Safeguarding and Prevent Procedures for disclosures
- Checking on learner welfare with the employer during tripartite progress reviews and when concerns are raised or otherwise noticed
- By reviewing awareness and understanding during tripartite progress reviews (Line manager present)
- Signposted to the Policy via the Training Agreement (Schedule 2) and the Policy is publicly available on the organisation's website www.greyseal.co.uk

Dealing with Allegations of Abuse

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

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

Allegations of Abuse against Grey Seal Academy Staff

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

The Designated Safeguarding Officer will take the appropriate steps to ensure the safety of the learner/colleague, and any others who may be at risk. The Designated Safeguarding Officer will also inform the Lead Designated Safeguarding Officer and will escalate to Senior Management Team, including the Managing Director in order that Grey Seal Academy procedures may be followed, and a disciplinary



investigation may be undertaken. If the allegation or concern is against a Designated Safeguarding Officer, it should be reported directly to the Lead Designated Safeguarding Officer.

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

Actions may include:

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

Information Sharing

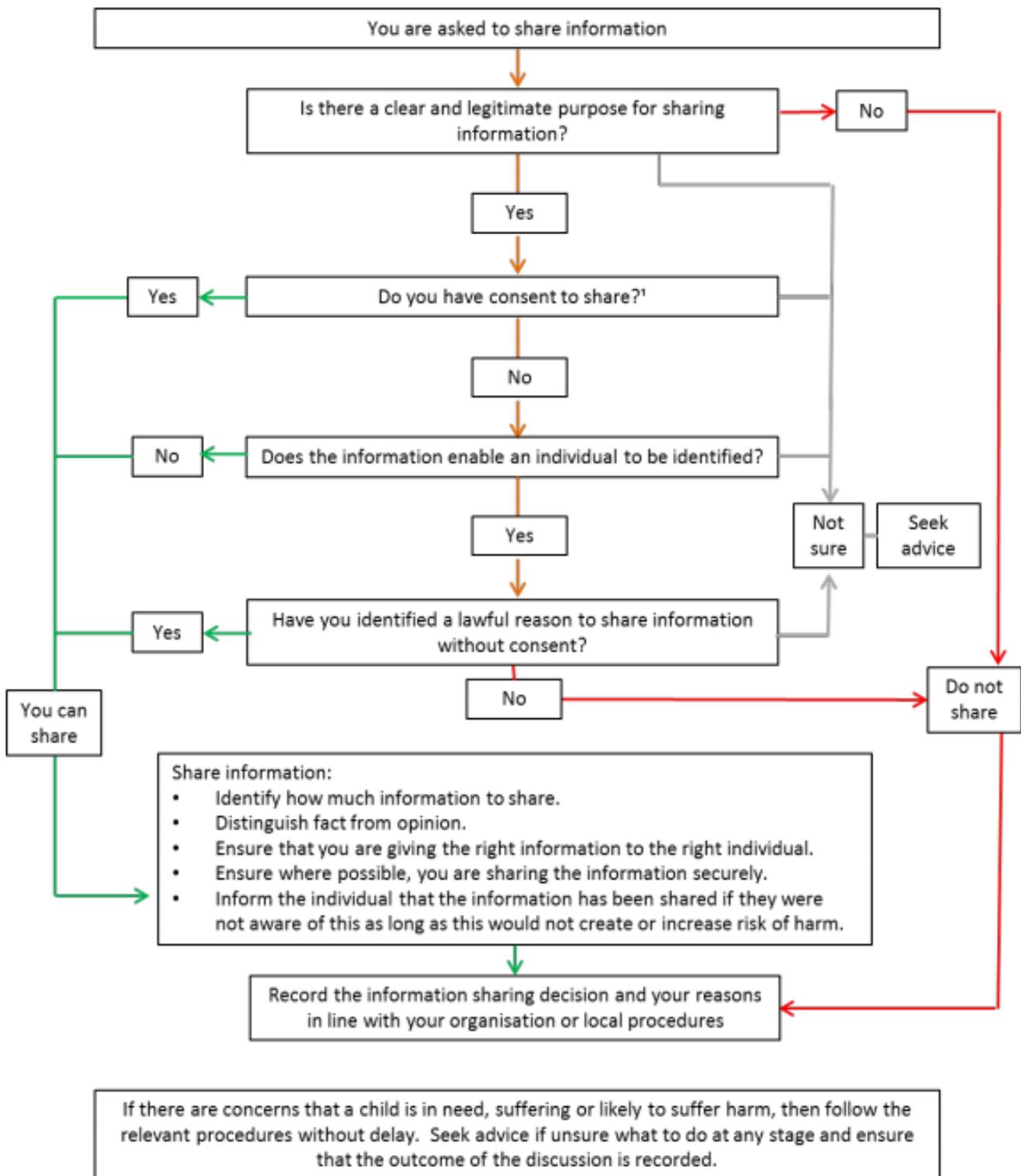
Grey Seal Academy is committed to sharing information for the purposes of safeguarding and promoting the welfare of children and young people in line with Working Together (2016) and with respect for The Data Protection Act (2018). Any decision to break confidentiality should always be preceded by informing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

The following flow chart taken from the guidance at the hyperlink below gives further information on the sharing of information

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>



Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time



IT & Systems

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

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

Grey Seal Academy also maintain certification under the Cyber Essentials and Cyber Essentials Plus Scheme which is retested / accredited annually.

Lone Working

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

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

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

Out of Hours Contact

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

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

Social Media

Grey Seal Academy sometimes uses social media in our work and we recognise that colleagues, learners and partners who are involved, have a responsibility towards the using and monitoring of their social media platforms. Social media is intended to be used as effective information, advice and guidance resource, further enabling our learners development in their personal development, behavior and welfare. Any content which raises a safeguarding concern must be reported to the Lead Designated Safeguarding Officer in line with the reporting processes on the previous pages.

Monitoring & Review

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



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

Access to Policy Documentation, Advice and Support

This Policy is made available to all delivery staff, Learners, Employers and other partners in formats appropriate to the various audiences e.g. on our website and sharepoint

Additional support is provided to Apprentices in the form of:

- Regular contact from their Trainer
- Tripartite reviews at least every 12 weeks
- Subjects embedded in their ongoing training
- Having contact details for their Trainer and Safeguarding Officer to use as needed (Provided thorough induction, emails, e-portfolio information and referenced in the available Policy)

During the apprenticeship Grey Seal Academy Trainers will develop a close working relationship with their learners. This process will enable them to identify any sudden change in their usual behaviour. This is important as a sudden change in this behaviour may indicate a support need. Any Grey Seal Academy Staff that identify a concern or potential concern should talk to their immediate Line manager or DSO as soon as it is practical to do so.

Children in Need and Specific Safeguarding Issues

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

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

This list is not exhaustive



Confidentiality Agreement

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

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

Through our our Safeguarding Process, there may be need to produce and keep records. These will never be a transcript and will be held securely. Any records made are strictly for the purpose supporting an extended safeguarding process, should it be needed.

The Safeguarding Process

Grey Seal Academy, while many of it is Learners are adult Learners, some will also be considered children under the law and may require special considerations in the event of a Safeguarding concern i.e.

Child = Aged 16 – 18

Adult = Aged 18+

Stage 1 – An individual discussed their concerns with a Grey Seal Academy Staff Member
 Stage 2 – a DSO will speak directly to the individual with the concern to assess support needs
 Stage 3 – A Safeguarding concern is referred to an external source of support i.e.

- Local Child Social Care Duty team (Where the disclosure concerns a child)
- Designated Officer of Local Authority (LADO)
- Police

It is not a given that a Safeguarding disclosure will progress through all 3 stages. Support will be defined on a case-by-case basis, using processes set out below.

When a Learner Makes a Disclosure to a Grey Seal Academy Staff Member

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

1.1. Staff member receiving the concern should:

- React calmly so as not to frighten the learner/colleague
- Demonstrate that you are taking what the learner/colleague says seriously
- Avoid leading the learner/colleague and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said, seen or heard
- Re-assure the learner/colleague but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments.

Tell them the following:

- They are not to blame and that they are right to tell
- Explain that you will have to inform your Designated Safeguarding Officer (DSO)
- If the person is a child, explain that their parent / carer may be informed unless there is reason to suspect doing so will place them in greater harm

1.2 If the conversation yields a Safeguarding Disclosure

See points A-D in "what to do next" below



When a Grey Seal Academy Staff Member identifies a potential / actual concern

<p>2.1 Hold a discussion with the individual concerned</p> <ul style="list-style-type: none"> • Explain to the individual what you have noticed. • Explain that they do not have to tell you anything they don't want to, however, if they are at risk of any sort of harm, you may need to involve others to get them the help they need. • Ask them how they are, do they need help and let them talk uninterrupted. • Avoid leading the learner/colleague and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said, seen or heard • Re-assure the learner/colleague but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments
<p>2.2 If the conversation yields a Safeguarding Disclosure</p> <p>See points A-D in "what to do next" below</p>
<p>2.3 If the conversation does not yield a Safeguarding Disclosure</p> <p>Let them know that they can always seek help via Grey Seal Academy and any of their Staff at any time.</p>

If you are still unsure as to what the right action might be, always inform your Designated Safeguarding Officer, even if this is informally for advice.

When an Employer Reports a Concern to Grey Seal Academy

<p>3.1 Staff member receiving the concern should:</p> <ul style="list-style-type: none"> • Gather information • Inform the employer that you will need to involve others, namely the DSO and any other agencies the DSO decides is appropriate to the situation e.g., Local Protective Services, Police and / or Prevent officers. • Complete a stage 1 form and pass this to the DSO
<p>3.2 DSO should discuss the Employers disclosure with the individual concerned</p> <ul style="list-style-type: none"> • DSO should follow A-D in "what to do next" below

What To Do Next

<p>A. Identify if they are at immediate risk of harm. The person receiving the disclosure must:</p> <ul style="list-style-type: none"> • Ensure the immediate safety of the learner/colleague • Contact the Grey Seal Academy DSO if the person receiving the disclosure is not a DSO • If the learner/colleague is in imminent risk of significant harm telephone for an ambulance and Police inform them of concerns and ensure that they are aware that this is a safeguarding issue • A record of the conversation is important but do not take notes while you are speaking to the person, this may put them off or distract you from really listening, do this afterwards on a Stage 1 report and pass this as soon as possible to the DSO via secure method i.e., direct email along with verbal discussion. (Record details such as Names of all involved, date, time, and venue/location – record the conversation/observations as accurately as possible)
<p>B. The LSDO must, on receiving notification of the disclosure where there is immediate risk of harm</p> <ul style="list-style-type: none"> • Contact the individual straight away and gather further information (Stage 2) • Contact Local Child Social Care Duty team, Designated Officer of Local Authority (LADO) immediately or failing that, the Police, if safety/ welfare is of immediate concern, refer all concerns/ allegations/disclosures that may or do constitute a criminal offence to the Police (Stage 3) • Update the Safeguarding Log (Held securely in Grey Seal Academy IT Systems) • If applicable and appropriate, parents/carers will need to be informed as soon as possible, but this must be from an appropriate source (children's social care/police) • The DSO should then follow up so far as is reasonably practical to ensure the individual receives the help, they need to ensure their safety and wellbeing and that their training might continue.
<p>C. Where there is no apparent immediate risk of harm or abuse</p>



- The person receiving the disclosure should document what they have heard / know on the **Stage 1** report and forward this to the DSO as soon as possible
- It is also ideal for the person receiving the disclosure to discuss it verbally with the LDSO or DSO

D. Where the issue is a concern rather than an allegation of abuse

- An example of a concern might be a mental health related difficulty, or a recent event that has caused a difficult time for the individual, it might be appropriate to make the DSO aware of it to ensure the Learner gets the help and advice they need.
- The concern may be disclosed by the individual or noted by Grey Seal staff e.g., noticing signs of depression or worry.
- In these instances, the person noting the concern should discuss the issue with the individual in the normal fashion and then follow this up by completing a **stage 1** report for the DSO
- The person reporting the concern should also verbally discuss the concern to gain guidance on support, this might mean
 - Where the person reporting the concern is the Learner's trainer, gaining advice from the DSO that they then pass on to the Learner, agreeing actions / review intervals etc.
 - The DSO would record this on the **safeguarding log** and follow this up regularly with the trainer to monitor the individual's wellbeing for improvement or further signs of risk.
- Where the DSO decides that further support is needed, they may contact the individual and have a further discussion. They would record this on a **stage 2** report in case of any onward referral, present or future if required.

NB. The above are scenarios and they are not exhaustive



When the LSDO considers that a Prevent Referral is required.

The LSDO will:

- Contact the regional Prevent Co-ordinator for the geographic area of the Learner
- Complete Prevent National Referral Form
- Forward Prevent National Referral Form as directed by Regional Prevent Co-ordinator.

Regional Prevent contacts can be found at the link below:

[Regional further education \(FE\) and higher education \(HE\) Prevent co-ordinators - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Policy Details; Definitions

A child or young person

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

Adult at Risk aged 18 or over

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

- A person who is or may be in need of community care services by reason of mental or other disability, age or illness
- A person who is or may be unable to take care of themselves or unable to protect self against significant harm or serious exploitation?

Categories of adults at risk of abuse, includes:

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

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

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

Significant Harm

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

British Values

British values are defined under the Counter Terrorism and Security Act (2015) as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"; institutions are expected to encourage students to respect other people with regard to the protected characteristics set out in the Equality Act 2010.



Extremism

The government has defined extremism in the Prevent Duty as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs."

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

Values

Principles or standards of behaviours; one's judgement of what is important in life.

Terrorism

Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.

Radicalisation

The process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Ideology

An ideology is a set of beliefs

Citizen

A legally recognised subject or national of a state or commonwealth, either native or naturalised

Citizen Education

Enables people to learn about their rights and responsibilities, and to understand how society works. It prepares them for dealing with the challenges they face in life. Through citizenship education, young people are encouraged to play an active part in the democratic process, thereby becoming more effective members of society. Effective citizenship education increases confidence, self-esteem, and motivation for learning

Religion

Religion can be explained as a set of beliefs concerning the cause, nature, and purpose of the universe, especially when considered as the creation of a superhuman agency or agencies, usually involving devotional and ritual observances, and often containing a moral code governing the conduct of human affairs

Belief

Indicates an acceptance that something exists or is true, especially one without proof, and represents trust, faith, or confidence in (someone or something)

Faith

Indicates strong belief in the doctrines of a religion, based on spiritual conviction rather than proof

Democracy

The term democracy is a Greek word which means 'Government by the people' and this entitles citizens of the UK (minus a few exceptions) to have the right to vote if they are aged 18 or over

Child Exploitation

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

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



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

What is meant by Abuse/ Neglect?

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

Physical Abuse:

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

For example:

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

Financial/Material Abuse

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

For example:

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

Psychological/Emotional Abuse



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

Other examples include:

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

Potential indicators of psychological / emotional abuse include:

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

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

Sexual Abuse:

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

For example:

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

Where abuse occurs against an apprentice, by an apprentice Grey Seal Academy will identify both parties as individuals in need of Safeguarding Support and conduct processes to this end irrespective of any other disciplinary or protective actions that may be required.

Discriminatory Abuse:

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

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

Potential indicators of discriminatory abuse may include:

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



- Expressions of anger or frustration by victim
- Weight loss

Modern Slavery

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

Cyberbullying

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

For example:

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

Potential indicators of cyberbullying may include:

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

Institutional/Organisational Abuse

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

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

Potential indicators of institutional abuse may include:

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

Radicalised or Extremist Behaviour

While not always easy to detect, signs may include:

- A sudden / unexplained change in behaviour
- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with students who are different
- Becoming abusive to students who are different
- Embracing conspiracy theories



- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups
- Sharing of extremist material
- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

Grey Seal Academy encourages its Staff, Learners and Employers to discuss any behaviour they may be concerned about so that the best advice and support can be provided.

Statutory requirements summary further advice and information

- The Care Act 2014
- Children (Protection at Work) (No2) Regulations 2000
- Children's Act 1989 (Amendment Act 2004)
- Counterterrorism & Security Act 2015
- Data Protection Act 2018
- Education Act 2011
- Education and Inspections Act 2006
- Employment Act 2008
- Equality Act 2010
- Freedom of Information Act 2000
- Human Rights Act 1998
- Learning and Skills Act 2000
- Protection from Harassment Act 1997
- Safeguarding Vulnerable Groups Act 2006
- Special Educational Needs and Disability Act 2001 (SENDA)
- Working Together to Safeguard Children Guidance (2018)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- The Education Inspection Framework and guidance relating to Safeguarding
<https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills/inspecting-safeguarding-in-early-years-education-and-skills>