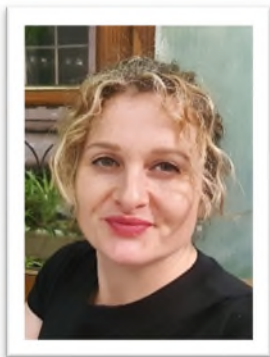# Lufton College

England Over 18s

Education Safeguarding Policy

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Contents

1. Safeguarding Management Team

Role	Name

Role	Name
Principal Deputy Designated Safeguarding Lead(s)	
Designated Safeguarding Lead	

2. School/College Key Contacts

Principal/Head Teacher	Name Phone Email
Chair of Governors	Name Phone Email
Safeguarding Governor	Name Phone Email
Designated Safeguarding Lead	Name Phone Email
Deputy Safeguarding Leads	Name Phone Email
Mental Health Lead	Name Phone Email
Key County Contacts	
Local Authority Adult Safeguarding Team Locality Telephone Numbers	
Making a referral to the Multi-Agency Screening Team (MASH)	
Inside of business hours (Monday – Friday / 9am – 5pm) please call **(insert number)** Outside of business hours (Monday – Friday / 9am-5pm) please call **(insert number)** to speak to the Emergency Duty Team.	

For making a referral outside of (**insert name of local authority**) this online tool directs you to the relevant adult safeguarding teams. Current Safeguarding Teams contacts - All nations.pdf	
(Insert name of local Police constabulary)	In an emergency call 999 / For all non-emergencies call 101 Home | Police.uk (www.police.uk)
Designated Officers for Managing Adult Allegations	
Duty Adult Safeguarding Team contact details (consultations, new referrals and urgent matters)	Name Phone Email

3. Introduction

This policy is written in line with the following statutory legislation and guidance:

Department for Education' publications for schools and local authorities.

Care Act 2014

Safeguarding Vulnerable Groups Act 2006

Mental Capacity Act 2005

Human Rights Act 1998

Equality Act 2010

Data Protection Act 2018

Prevent Duty Guidance (2023)

This policy is for all staff in schools/colleges in England only. There is an extension to this policy for those offering accommodation to students as:
- A Residential Special School/College
- A Residential Home attached to the School/college
- Post 16 Specialist college with attached accommodation.

This policy outlines a framework for all staff, at all levels, permanent or agency basis, to meet their statutory duties in relation to Safeguarding students over 18 years and ensures consistency of good practice across the school/college. This policy ensures all staff have clear guidance on how to manage a concern of abuse, harm, neglect or exploitation towards a student over 18 years both externally and internally.

This Safeguarding Policy is written for students over the age of 18 years. For any Safeguarding/Child Protection concerns in relation to students under the age of 18 years, please refer to the Safeguarding/Child Protection Policy.

Wider Policies support this Safeguarding Policy and are embedded within the school/college's approach to safeguarding.

1. Safeguarding/Child Protection Policy
2. The Role of the DSL Policy
3. Child on Child Abuse Policy
4. Filtering and Monitoring Policy
5. Managing Low Level Concerns Policy
6. Schools Safer Recruitment Policy
7. Managing Contextual Risks to Children
8. Safeguarding over 18 years Policy
9. Online Safety Policy
10. Remote Learning Policy
11. Whistleblowing Policy
12. Behaviour Policy
13. PREVENT Policy
14. Physical Intervention Policy
15. SEND Policy
16. Staff Behaviour Policy/Code of Conduct
17. Absent from Education Policy

Staff also refer to the Group Adult Safeguarding Policy for further information on safeguarding processes and practices for those over 18 years.

4. Aims of this policy

This policy ensures that:
- Staff are aware of their responsibilities to safeguard students over 18 years
- Staff know the difference between an allegation and disclosure
- Staff know how to identify a safeguarding concern
- Staff know how to respond to an allegation/disclosure of abuse, neglect or exploitation
- The DSL and staff are clear on their roles and can respond and record concerns effectively and promptly
- The DSL and staff approaches to managing risk are proportionate, person-centred and embedded within a multi-agency framework
- The safeguarding process improves the quality of life for those adults concerned

5. Safeguarding

Abuse is a violation of an individual's human and civil rights by any other person or persons. Safeguarding must aim to stop abuse, neglect and exploitation wherever possible. Safeguarding must prevent harm, reduce the risk of it happening and enable adults at risk to have choice and control in how they live their lives.

In line with the Mental Capacity Act 2005, safeguarding approaches are underpinned by the following core principles:

- Presumption of capacity: Every student is assumed to have capacity unless proven otherwise.

- Support to decide: Staff must take all practicable steps to help students make their own decision (e.g., accessible information, communication aids, time of day, advocacy).
- Unwise decisions ≠ lack of capacity: Adults have the right to make decisions others consider unwise; this alone does not indicate lack of capacity.
- Best-interest decisions: Where a student lacks capacity for a specific decision, any action must be made in their best interests.
- Least restrictive option: Any decisions made are proportionate and have the least restrictive impact on the person's rights and freedoms.

Local Safeguarding Adult Board's (LSAB)'s and / or Safeguarding Partnership's help and protect adults at risk, through coordination of a multi-agency system made up of Local Authority (LA) Social Services, National Health Service (NHS) Integrated Care Boards, providers, police, and regulatory services such as the Care Quality Commission (CQC).

This policy should therefore be read in conjunction with the Multi-Agency Safeguarding policy and procedures published by each local LSAB where the school/college are delivering services. This local information will be accessible on the Local Authority's website.

Insert link to LSAB website

6. The Safeguarding Culture

At our school/college, safeguarding permeates all aspects of school/college life and is everyone's responsibility. The school/college forms part of a wider safeguarding system and in order to fulfil our responsibilities, we adopt a person-centred approach. This means safeguarding systems and procedures are oriented around the wishes, feelings and best interests of over 18s students. We seek to give our students a 'voice', listen to what they say, take them seriously and work collaboratively in order to meet their needs. We are also aware that certain issues may impact a student's ability to speak openly such as being from a SEND or LGBTQ background and work hard to ensure such students are supported to express their views and feel heard.

The school/college's safeguarding culture can best be described as the following;

- **Proactive**, (being professionally curious to determine further information in the interests of the student. It is essential that staff exercise professional curiosity at all times, as it is likely that signs of any form of abuse, neglect or exploitation will be identified when dealing with an un-associated incident. Having strong governance and leadership, raising awareness through and enhancing student's capacity around the risks and their own safety, regular reflective supervision).
- **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other professionals in timely manner, active listening, applying theory in practice in a methodical way).
- **Reflective** (understanding 'how we got there in the first place', completing a chronology to identify 'lessons learned' with other key professionals in order to identify ways to improve practice)

7. Roles and Responsibilities

Proprietor and representative (Regional Lead)

The Proprietor has a strategic leadership responsibility for safeguarding. They facilitate a whole school approach, ensuring all relevant aspects of process, policy and systems development are in in line with promoting the student's safety and welfare.

The Proprietor's representative (Regional Lead) is responsible for all strategic aspects of the policy and will ensure senior staff receive appropriate training and support to undertake their roles and that a log of their training is maintained. The Proprietor's representative will ensure through site-based reviews that all safeguarding related policies and procedures are transparent, clear and easy to understand for staff, visitors, pupils, parents and carers.

Additionally, the Proprietor's representative (Regional Lead) is responsible for receiving concerns/allegations about the headteacher or principal and agreeing any appropriate course of action for investigation. This includes liaison with the local authority Adult Safeguarding Team if the matter meets the criteria for being considered as an allegation.

Headteacher/Principal

The Headteacher will support staff and governors to understand their individual roles and responsibilities by ensuring all approved safeguarding related policies and procedures are fully implemented. They liaise with the local authority Adult Safeguarding Team and partner agencies in the event of allegations being made against a member of staff or volunteer. They ensure staff receive appropriate updated safeguarding and child protection training whilst providing support to the DSL, ensuring cover for this role in the DSL's absence. The headteacher also ensures that the curriculum supports students to understand how to keep themselves safe alongside promoting a strong, open and positive culture of safeguarding across the school.

Designated Safeguarding Lead (DSL) and Deputies

The DSL and Deputies are responsible for ensuring multi-agency working including information sharing and attendance at all related safeguarding meetings. They are also responsible for raising safeguarding awareness throughout the school/college in addition to ensuring appropriate support and training for staff. In addition, the DSL maintains effective recording systems of all concerns and outcomes.

Upon receipt of a concern, the DSL passes the concern to:

- the host local authority Adult Safeguarding Team if the allegation/disclosure is against a staff member
- the allocated Social Worker/Adult Social Services dept when the allegation/disclosure concerns someone other than a staff member and, where appropriate, the student's parent/carer
- If the DSL believes a crime has been committed, the police are also informed.
- The DSL also informs their headteacher/principal and Regional Director.

The DSL ensures immediate action is taken to ensure the student is safe. If unsure the DSL discusses these actions with the local authority Adult Safeguarding Team and/or Social Worker depending on the nature of the concern. The DSL records the allegation/disclosure and any relevant actions on BehaviourWatch and/or Data Bridge.

The local authority Adult Safeguarding Team and/or Social Worker informs the DSL of next steps and whether an investigation is required. If an internal investigation is required the DSL consults with the Regional Director and the Compliance & Regulation Team.

Designated teacher

The designated teacher works closely with the DSL to ensure safeguarding concerns of looked after students are addressed quickly and effectively. They assume a strong advocacy position; recognising the signs of abuse and harm whilst reporting concerns as outlined in the reporting process within the body of this policy. They maintain a record of concerns and actions, reporting these to the DSL.

All School Leaders, Staff and Volunteers

All staff have student's safety and well-being at the heart off all they do and understand the policies and processes to follow where they suspect a student is suffering, or is likely to suffer from harm. All staff maintain an attitude of 'it could happen here' and remain vigilant to signs and indicators of abuse and harm. Staff receive safeguarding training and are aware they must report all allegations and concerns to the DSL immediately. If staff do not feel they have relevant safeguarding skills, knowledge or experience they inform the DSL immediately so that additional training can be sourced.

8. Early Intervention

Early intervention services are services that promote an individual's/family's well-being and independence by improving outcomes and resilience. The safeguarding process intervenes early and does not wait until crisis point. This support prevents risks/needs escalating whilst supporting individuals to retain or regain their skills and confidence.

The designated safeguarding lead (and their deputies) know what the local early intervention process is and how and where to access support.

Insert Link of local Early Intervention Service

9. Harm, Abuse and Neglect

Staff are aware that harm, abuse and neglect are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap which may be physical, verbal or psychological acts.

The Care Act (2014) defines abuse within the following 10 categories:

- Physical Abuse
- Domestic Abuse or Violence
- Sexual Abuse
- Psychological or Emotional Abuse
- Financial or Material Abuse
- Modern Slavery

- Discriminatory Abuse

- Organisational or Institutional Abuse

- Neglects or Acts of Omission

- Self-Neglect

Physical Abuse

Physical injuries which are unsatisfactorily explained, or where there is a definite knowledge or a reasonable suspicion that the injury was inflicted with intent, or through deliberate lack of care by another who cares for the other. E.g pushing, pinching, slapping, punching, scratching, force-feeding, misuse of restraint or inappropriate, improper administration of medicine, female genital mutilation etc.

Physical Neglect

Physical neglect is when an individual's health and/or development/general well-being is impaired due to inadequate care being provided.

Sexual Abuse

The suspicion, or disclosure, that a person is involved in sexual activities that cause distress and/or to which the vulnerable adult has not given informed consent or he/she could not give consent, and/or which violate the sexual taboos of family roles, rape or attempted rape, sexual assault or harassment, not contact abuse e.g. voyeurism, photography.

Sexual Exploitation

Involves exploitative situations, contexts and relationships where adults at risk (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. It affects men as well as women. People who are sexually exploited do not always perceive that they are being exploited.

In all cases, those exploiting the adult have power over them by virtue of their age, gender, intellect, physical strength, and/or economic or other resources. There is a distinct inequality in the relationship.

Emotional/Psychological Abuse

The systematic intimidation, blaming, controlling, cohesion, harassment or humiliation of a person, verbal abuse or deliberate continuous isolation of a person from social contact, abandonment, or failure to meet cultural requirements, humiliation and ridicule, faith abuse, failure to provide access to appropriate social skills and educational development training, withdrawal from services or supportive networks so that her/his potential for development is seriously impaired.

Domestic Abuse

Domestic abuse involves any single incident or pattern of conduct where someone's behaviour towards another is abusive, and where the people involved are aged 16 or over and = are, or have been, personally connected to each other (regardless of gender or sexuality). The abuse can involve, but is not limited to: psychological, violent, threatening, controlling, coercive behaviour, sexual and financial.

Exploitation

Opportunistically or premeditated, unfairly manipulating someone for profit, personal gain, modern slavery, human trafficking, and radicalisation. Signs can be similar to those relating to sexual exploitation and County Lines.

Exploitation – County Lines

County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves criminal exploitation as gangs use vulnerable people to move drugs and money.

There is often also some form of exchange (e.g. carrying drugs in return for something) where the victim is offered, promised or given something they need or want, the exchange can include both tangible (money, drugs, clothes etc) and intangible rewards (status, protection, perceived friendship, affection etc).

Financial Abuse

The use of a person's assets and/or financial resources other than for purposes directed by them and/or other than their best interest. Including theft, exploitation, pressure in connections with wills, property, inheritance, or financial transactions. Also, the misappropriation of property, possessions and benefits.

Ill-Treatment or Wilful Neglect

The Mental Capacity Act 2005 introduces two new criminal offences: ill treatment and wilful neglect of a person who lacks capacity to make relevant decision. For a person to be found guilty of ill treatment, they must either have deliberately ill-treated the person, or be reckless in their care of the person resulting in the person's ill treatment.

Examples include carers bullying an individual, failing to provide adequate food, clothing, medical aid or accommodation etc. Signs may be failing to thrive, poor personal hygiene, hunger, thirst, dehydration, fear, unremoved hazards and social isolation amongst others.

Discriminatory Abuse

This type of Abuse is motivated by discriminatory and oppressive attitudes on the grounds of disability, gender, gender identity/reassignment, age, race, religion, belief, sexual orientation, and political beliefs.

It may manifest as physical/sexual/financial/psychological abuse or theft, neglect and harassment. It includes racist, sexist, homophobic or ageist comments, jokes or any other form of harassment. It also includes not responding to dietary needs and not providing appropriate spiritual support.

Neglect/Neglect of Self

Self-injurious behaviour and acts of omission. Failure of a person to care for him/herself, with the result that there is a likely or actual serious impairment to their health and the failure of carers to recognise this and to take appropriate corrective action.

Institutional/organisational Abuse

This is 'the mistreatment, abuse or neglect of an adult at risk by a regime or individuals. It can take place within settings and services that adults at risk live in or use. It violates the person's dignity and is a lack of respect for their human rights. The abuse occurs when the routines, systems, and

regimes of an institution result in poor or inadequate standards of care or poor practice. It can take the form of organisations failing to address examples of poor practice brought to their attention' (SCIE 2013).

Radicalisation

This 'refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism' (Prevent HM Govt. 2011) CareTech recognises the threat of terrorism and understands many terrorists are radicalised in the course of their contact with others. Adults at risk are particularly prone to being exploited and adopting extremist agenda. A separate PREVENT policy is in place for risks relating to radicalisation. Please refer to the link below for guidance.

Insert link for PREVENT policy

Modern Slavery or Human Trafficking

This constitutes slavery, servitude and forced or compulsory labour. Someone is in slavery if they are:

- Forced to work – through mental or physical threat;

- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;

- Dehumanised, treated as a commodity or bought and sold as 'property';

- Physically constrained or has restrictions placed on his/her freedom of movement.

Slavery takes various forms and affects people of all ages, gender and races. Adults who are enslaved are not always subject to human trafficking. Recent court cases have found homeless adults who were promised paid work to be enslaved and forced to work and live in dehumanised conditions. This is in addition to adults with a learning difficulty who were restricted in their movements and threatened in order to hand over their finances and work for no gains.

The DSL seeks consent from those over 18 years prior to making any referrals to the National Referral Mechanism. If consent is refused, the concern should be reported via the 'Duty to Notify' process via the Home Office's online referral system.

Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons and it can be known as female circumcision, cutting or Sunna. Sometimes, religious, social or cultural reasons are put forward for this happening but it is abuse and a criminal offence, to a woman or child. The term covers all harmful procedures to the female genitalia for non-medical purposes. More information can be found by contacting Female genital mutilation (FGM) - Victim Support

Forced Marriage

Forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. In a situation where there is concern that an adult is being forced into a marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage

provisions and the adult safeguarding process. In this case action will be coordinated with the police and other relevant organisations. The police must always be contacted in such cases as urgent action may need to be taken. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

Honour-based Violence

Honour-based violence will usually be a criminal offence, and referring to the police must always be considered. It has or may have been committed when families feel that dishonour has been brought

to them. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community. Adult safeguarding concerns that may indicate honour-based violence include domestic violence, concerns about forced marriage, enforced house arrest and missing person's reports.

Mate Crime

A 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate crime is often difficult for police to investigate, due to its ambiguous nature, but should be reported nonetheless. Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Restraint

Unlawful or inappropriate use of restraint or physical interventions may constitute a criminal offence in some circumstances. Restraint is the use of force, threatening to use force, physically making someone do something they are resisting, or where freedom of movement is restricted.

Signs that a staff member could be causing harm to a student

- Using restraint when it's not needed
- Having favourites
- Giving treats, presents or money to individuals without permission from headteacher/principal
- Finding ways to spend time with an individual perhaps by working longer hours
- Finding ways to spend time alone with a particular individual
- Inviting an individual to their own house without permission from a headteacher/principal
- Being over-friendly with certain individuals, parents or guardians
- Taking photos of individuals that aren't for work purposes
- Trying to make private contact with an individual by text, email, mobile phone, online or in letter
- Finding ways to have physical contact
- Keeping collections of items that might attract people at risk
- Controlling behaviour
- Narcissistic characteristics
- Bullying
- Humiliation
- Yelling and shouting
- The threat or use of violence

- Destroying personal items
- Accusing the student (the victim) of committing abuse against them

10. Mind of My Own

Mind of My Own is available to support all students in the day school sector across Care Tech services. This is used via an app or computer log in and enables a student's views, wishes and feelings to be shared digitally as well as, or, instead of verbally. To access Mind of My Own, students can set up their own account and this can be supported by the use of staff 'Practitioner Accounts'.

Mind of my own is not an emergency service and should a concern arise staff need to follow the reporting in this policy and should not rely on the app to perform this role. Regarding safeguarding, students have the opportunity to raise concerns if they wish. More specifically the One App has a function called 'Safety Link' which is triggered if a student mentions or chooses the words 'unsafe', 'scared' or 'unhappy' . Portal admins are instantly notified of such statements, which then provides opportunity to discuss directly with the student when they next meet. As already mentioned above if students raise any safeguarding concerns, this information needs to be treated exactly the same as any other safeguarding concern and reported as per the procedures within this policy.

Mind of My Own enhances our ability to hear and listen to a student's voice and does not replace any existing methods that are already working for our students. All we know is that sometimes even when we have a good positive relationship with a student they can find it difficult to share their true thoughts, feelings and emotions. By sending a statement via Mind of My Own students

have the opportunity to share those thoughts, feelings and emotions without the need for face to face interaction and when they feel ready not when we are asking. Our students also felt able to tell staff via Mind of My Own of their concerns if they did not feel comfortable talking face to face.

11. Student on Student abuse

The school/college is aware that students are capable of abusing other students and maintain an attitude of 'it could happen here`. All staff understand the Student-on-Student Abuse policy. Please refer to the link below.

Insert Student on Student Abuse Link

12. Residential Homes attached to Schools/Colleges

Staff working in residential homes follow **the home's policy** when a
Safeguarding concern arises and not the school policy. Communication is strong between the Registered/Homes Manager and the Responsible Individual for the home. This, in most cases is the Principal/Headteacher.

Staff in these homes are:

- alert to the extra vulnerabilities of SEND students
- alert to inappropriate student relationships and the potential for student-on-student abuse, particularly in schools and colleges where there are significantly more females than males or vice versa.
- vigilant in reporting inappropriate relationships or behaviours that are a cause for concern
- compliant with the additional safeguarding requirements relating to National Minimum Standards and regulations for all schools and colleges with residential provision for students
- compliant with Standard 13 in National Minimum Standards for residential special schools. [Residentials special schools national minimum standards](#)
- compliant with the standards of the relevant regulatory body (SCCIFF/DfE NMS/CQC)

More information regarding the SEND vulnerabilities of your students can be sourced from the Headteacher/Principal and must be clear throughout student's plans.

The group policy for anti-bullying and the school student-on-student abuse policy gives more information regarding the risks students face in a larger setting. Staff follow these polices.

Insert Link for anti-bullying and student-on-student abuse policy

13. Students Missing from Education

Staff recognise that a student who is missing from education could be at risk of harm, abuse and exploitation, particularly those who are absent frequently or for prolonged periods of time. All staff understand the Missing from Education Policy and are aware of the processes to follow in such circumstances.

Insert link for Children/Students Missing from Education Policy

14. Preventing Radicalisation – The PREVENT Duty

Similar to protecting students from other forms of harms and abuse, protecting students from radicalisation is an integral part of the school/college safeguarding approach. The School/College adopts the PREVENT policy and procedures in the event of related concerns.

Insert Link for Prevent Policy

15. Online Safety

The school/college adopts a whole school/college approach to online safety which enables the protection and education of young people and staff in the use of technology. There are mechanisms in place to identify, intervene in and escalate any concerns. The school/college recognises technology may be a significant feature in safeguarding issues and that students can use this forum to abuse other students or be at risk from others. The school/college also ensures appropriate filters and monitoring systems are in place. Please refer to the links below for the school/college's online and filtering/monitoring policies.

Insert Link for Filters and Monitoring & Online Safety Policies

16. Special Education Needs & Disabilities

As a provider of specialist education and care services, all staff are aware that individuals with special educational needs and disabilities:

- Are more likely to be abused or neglected;
- May display behaviour, mood and/or injury, which may relate to possible abuse and not just their SEN or a particular disability.
- Have a higher risk of peer group isolation.
- Can be disproportionally impacted by things like bullying without outwardly showing any signs.
- Experience communication barriers and difficulties in overcoming these barriers.

Please refer to the SEND Policy link below for further guidance

Insert Link for SEND policy

17. Staff management of allegations and concerns

This part of the guidance is followed where it is alleged that anyone working in the school or a college who provides education for persons aged 18 years or over, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a student, or may have harmed a student and/or
- possibly committed a criminal offence against or related to a student, and/or
- behaved towards a student in a way that indicates he or she may pose a risk of harm to students and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with students - including behaviour that may have happened outside of school or college

This policy guides staff in how to record and pass information quickly to prevent the student from risk of further harm.

Staff should not:

- Investigate or ask leading questions
- Make assumptions or offer alternative explanations
- Promise confidentiality - the person/persons should be advised that the concern will be shared on a 'need to know' basis
- Share information outside of the reporting process
- Clean a room where an allegation is alleged to have taken place nor move anything or allow people access to the room in order to preserve forensic evidence
- Encourage the victim to wash or change their clothes; (in the case of sexual assault, or if there is a suggestion of oral sex, do not encourage the person to clean their teeth or give them a drink until mouth swabs have been taken by the police) in order to preserve medical or forensic evidence on the person

Staff should make sure the student is safe

- Stay calm.
- Listen to and take seriously any disclosure or information.
- Try not to show signs of shock or disbelief.
- Do not express feelings or judgements
- Allow the student to talk freely and avoid asking leading questions (TED questions are advised – tell me, explain and describe).
- Reassure the student and explain that they have done the right thing in telling you.
- Explain to the student, what you have to do next and who you have to contact.
- Record the information / disclosure immediately in the student's 'own words.'
- Record the facts and do not put your own judgement within the record. Always record who was present, date, time, the questions you asked and what the student has said in their own words.
- Immediately report to the DSL
- Immediately report to Police if the student is at risk of imminent significant harm
- Reassure the student they will be supported and kept safe
- Be aware that student may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a student.

18. Safeguarding Process - Timescales for staff sharing an allegation/concern

Immediately

- Staff to report allegation to the DSL or DSL Deputy if DSL not available
- Staff to ensure the student is kept safe from immediate danger and risk
- Staff to call Police if the student is in immediate danger
- If allegation is about the DSL, staff to report allegation to Head Teacher/Principal

Throughout the processes

- Staff fully support any investigative processes undertaken by police or social services
- Staff keep the student and the student's circumstances under review and should make the DSL aware if concerns escalate
- Staff adhere to the communication strategies outlined in this policy and are aware that attempts to ask probing or leading questions may hamper any potential police/social services investigations

See appendix 1 for a flow chart of the above process

19. Safeguarding Process - Timescales for DSL / Headteacher / Principal dealing with an allegation/concern

At the earliest opportunity/end of the working day
- DSL completes local authority adult safeguarding team initial referral/notification form **(if allegation relates to staff member and merits referral)** or refers to adult social services (if required)
- DSL informs Headteacher/Principal
- If allegation is about Head Teacher/Principal/RD, DSL informs the appropriate line manager
- If required Head Teacher/Principal informs HR **(if allegation relates to a staff member)**
- Head Teacher/Principal considers whether SUI should be completed
- If adult safeguarding team referral is not required, the DSL considers actions such as pastoral support, referral for early intervention services via local adult social services team and monitoring etc

Within 24 hours
- DSL attempts to communicate with the local authority adult safeguarding team/adult social services team regarding potential safeguards required to keep student safe **(if allegation relates to a staff member)** and in all other circumstances communicates with adult social services dept. Adult safeguarding team/or adult social services dept to implement any necessary risk assessment/risk management plans that arise from discussions.
- DSL attempts to ascertain feedback from adult social services/adult safeguarding team as to whether a s42 enquiry is required.
- If required, Head Teacher/Principal completes sections 1, 2 AND 3 of SUI and sends to Managing Director
- If appropriate, DSL completes a 'check in' with the student and records this as part of the concern pack
- DSL ensures identified actions to keep the student safe have been implemented
- In the event of a police or section 42 enquiry, the DSL and Headteacher/Principal take guidance from police and/or adult social services regarding their approach to any management investigation as direct communication with the student or relevant others about the allegation may impact the outcome of any investigations. DSL and/or Headteacher/Principal issues appropriate guidance to staff about this also
- Consideration to be given to a referral being made to the regulatory body which the accused is member of, e.g. TRA, CQC, Ofsted **(if allegation relates to a staff member)**

Within 5 days
- Headteacher/Principal commences Management Investigation (if appropriate and no section 42 enquiry)
- Headteacher/Principal consults HR as part of the process if required
- DSL or Head Teacher/Principal pursues all agencies for dates of any up and coming investigative meetings and facilitate these on-site if required

If a section 42 enquiry remains ongoing
- DSL or Headteacher/Principal attempts to pursue agencies every 3-5 days for updates.
- Head Teacher/Principal updates SUI inbox and Regional Director of any significant updates.

Within 30 days

- If there is no outcome after 30 days, DSL or Head Teacher/Principal attempts to pursue outcome of any social services investigations
- Head Teacher/Principal updates Regional Director with outcomes and lessons learned
- Head Teacher/Principal updates Compliance & Regulation Team of the above
- Head Teacher/Principal sends email to Head of Quality and Head of Policy regarding any gaps in staff practice which will lead to a revision of policy

Upon conclusion of section 42 enquiry

- Head Teacher/Principal updates the Regional Director and Compliance and Regulation Team with outcomes and lessons learned
- DSL to communicate with identified staff members to ensure student's plans including risk assessments of students involved are updated
- Head Teacher/Principal to E-mail to Head of Quality and Head of Policy of any gaps in staff practice which will lead to a revision of policy.
- If a member of staff has been found guilty of gross misconduct on a safeguarding issue, the manager must inform DBS and the regulatory body with the outcome of any disciplinary action.
- If the member of staff leaves their post prior to completion of disciplinary process then the hearing will continue in their absence in line with the disciplinary policy with DBS and the regulatory body still being informed

See appendix 2 for a flow chart of the above process

20. When to call the police

Guidance from NPCC (National Police Chief's Council Guidance) – `When to call the Police` helps the team to understand when they should consider calling the police and what to expect. It also ensures that any contact with the police is appropriate and timely. Please refer to the link below.

When-to-call-the-police--guidance-for-schools-and-colleges.pdf

21. Allegations against the DSL or Head Teacher/Principal

Where the Head Teacher/Principal is the subject of an allegation, the report is made directly to their line manager. Where the DSL is the subject of an allegation, the report should be made directly to the Head Teacher/Principal. Where the allegation is against the Head Teacher/Principal, the report should be made to their line manager.

22. Concerns regarding Persons in a Position of Trust (PiPoT)

A PiPoT is anyone in a role—paid, unpaid or as a student leader—where they exercise authority, power or influence over learners with care and support needs.

Their position gives rise to an expectation of trust and the potential to exercise control, supervision or guidance

Triggers for a PiPoT safeguarding concern include;
- • Behaves in a way that has harmed or may harm a student (physically,   emotionally, sexually or financially)
- • Engages in sexual activity with a student, including grooming, sharing indecent images, inappropriate messaging or boundary crossings
- • Uses their position to exert undue influence, intimidation or coercion over a learner
- • Discloses private or sensitive information without consent, breaching confidentiality
- • Exhibits behaviour—inside or outside work—that calls into question their suitability to work with vulnerable adults or students

Staff report any concerns regarding Persons in a Position of Trust (PiPoT) according to the safeguarding process outlined in this policy.

22. Managing concerns or allegations that do not meet the harm threshold

As part our whole school / college approach to safeguarding, our schools / colleges promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

In doing this we aim to:

- ▪ identify inappropriate, problematic or concerning behaviour early
- ▪ reduce the risk of abuse, neglect or exploitation
- ▪ ensure that adults working in or on behalf of the school/college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school/college

All concerns are reported to the DSL immediately. The DSL gathers basic information to decide on how to escalate, this information will include, the names of the students involved, their age, a description of the allegation/concerns and any factors which could place the student at further risk.

The DSL then discusses with the Headteacher/Principal and the rest of designated team to decide whether this can be managed as a low-level concern or will require a referral to an external agency such as the local authority Adult Safeguarding team and/or adult social services dept.

The school/college takes all concerns seriously no matter how small and just because a concern may be deemed as `low level` it does not mean that it is insignificant and should not be taken seriously. A `low level` concern is still a concern and should be addressed effectively and in line with local adult safeguarding arrangements. Staff familiarise themselves with local adult safeguarding arrangements for their respective area and ensure they adhere to these. For example, what may be considered a 'low level' concern in one area may constitute a safeguarding concern requiring Adult Safeguarding Team/Adult Social Services involvement in another.

Please refer to the Managing Low Level Concerns Policy link below for further guidance

Insert Link for Managing Low Level Concerns Policy

23. SUI Process

The Serious and Untoward Incident process (SUI) is an important component of the safeguarding process and must be completed where it is deemed necessary. A Serious and Untoward Incident is an event resulting in, or posing the risk of, significant harm, distress, or death. It could also have been a 'near miss' where an event could have led to a serious incident but was averted.

The SUI process is one which promotes the immediate safety of those harmed, allows for a timely investigation of the circumstances surrounding the incident, ensures post-incident actions are undertaken in addition to creating opportunities for review and evaluation.

Furthermore, the process enables serious incidents to be communicated to relevant heads of service about issues including potential financial risk (e.g. potential insurance claims), reputational risk (e.g. media coverage) in addition to alerting the Director of Safeguarding who upon receipt of the SUI form will provide guidance and support to schools throughout any child protection/safeguarding processes.

The SUI Reference Form outlines 5 risk categories that would merit the completion of an SUI Form. Staff refer to this for guidance about what incidents would require to be dealt with under the SUI process and ensure the form is completed within set timescales. Please refer to the SUI Reference Form and SUI Briefing Form links below for further guidance

Insert Link for SUI Policy, SUI Reference Form and SUI Briefing Form

24. Safer Recruitment

Our school complies with the Safeguarding Vulnerable Groups Act 2006 and takes steps to prevent people who pose a risk of harm from working with students. We do this by adhering to statutory responsibilities to check staff who work with students, by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The school/college will take proportionate decisions on whether to ask for additional checks beyond what is required whilst ensuring volunteers are appropriately supervised. Please refer to the Safer Recruitment Policy link below.

Insert Link for Safer Recruitment Policy

25. Whistleblowing

The Whistleblowing process offers a route to report safeguarding concerns for staff who feel unable to raise these with the DSL or Headteacher. By promoting transparency and accountability, it helps uncover risks early and ensures vulnerable individuals are protected. To reinforce this commitment, our school operates a dedicated whistleblowing telephone number for anyone who needs an alternative channel to speak up. This independent hotline underscores that every concern is taken seriously and that no one should ever feel silenced when welfare is at stake. The Whistleblowing Hotline number is open 24 hours a day/7-days a week and can be reached on 0800 086 9128. Alternatively, concerns can be logged using their online portal at caretech.ethicspoints.com/ Please refer to the Whistleblowing Policy link below for further information.

(Corporate) Group Whistleblowing Policy – onrezume.com

26. Sharing Information

Effective safeguarding depends on sharing relevant information promptly and securely with the right people. Information regarding concerns, disclosures, or observations are never held back due to uncertainty; when in doubt, staff seek advice. The General Data Protection Regulation does not prevent the sharing of information where it is necessary to safeguard vulnerable people; in fact, GDPR explicitly permits the lawful exchange of personal data in the vital interests of protecting vulnerable people.

25. Review History

A review will be undertaken annually as a minimum. However, subject to a significant safeguarding concern this policy and all other attached policies will be reviewed and monitored as part of a lessons learned review.

This policy was reviewed in August 2025 by Laura Dickie (Head of Policy), Jo Dunn (Director of Compliance, Quality and Regulation - Children), Lindsey Appleby-Flynn, the DSL of the School and agreed by the head of the Governance Board.

Next Review – September 2026

Appendix 1 – Safeguarding Process – Staff sharing an allegation/concern

Immediately

- Staff to report allegation/concern to DSL or Deputy DSL
- Staff to ensure the student is kept safe from immediate danger/risk
- Staff to call police if student is in immediate danger
- If allegation/concern is about DSL, staff to report allegation/concern to Head Teacher/Principal

Throughout the Process

- Staff to fully support any investigative processes by police/adult social services
- Staff keep the student's circumstances under review and report to DSL if concerns escalate
- Staff adhere to communication strategies outlined in policy

Appendix 2-Safeguarding Process –DSL/Head Teacher/Principal dealing with allegation/concern

| Earliest Opportunity/End of Working Day | • DSL completes adult safeguarding team/Adult social services referral/notification form (if required)
• DSL informs Headteacher/Principal
• Head Teacher/Principal informs HR (if required and allegation about staff)
• Head Teacher/Principal considers whether SUI form required
• DSL considers Early Intervention referral, Pastoral Care etc |

| Within 24 hours | • DSL attempts to communicate with Adult Safeguarding Team or adult social services about safeguards and whether s42 enquiry is required
• Head Teacher/Principal completes SUI - Section 1, 2 and 3 (if required)
• If appropriate DSL completes and records 'check in' with student
• DSL ensures actions to keep student safe have been implemented
• DSL/Head Teacher/Principal takes advice from police and adult social services regarding their approaches towards management investigation
• Head Teacher/Principal to consider referral to regulatory body |

| Within 5 days | • Head Teacher/Principal commences Management Investigation (if appropriate and no S42 enquiry required)
• Head Teacher/Principal consults HR if required
• If section 42 enquiry required - DSL/Head Teacher attempts to pursue agencies for potential investigation and facilitates meetings on-site if required |

| If a S47 remains ongoing | • DSL or Head Teacher/Principal attempts to pursue agencies every 3-5 days for updates
• Head Teacher/Principal informs SUI inbox and Regional Director of any significant updates |

| Within 30 days | • DSL or Headteacher/Principal attempts to pursue outcomes of any social services investigations
• Head Teacher/Principal updates Regional Director with outcomes and lessons learned
• Head Teacher/Principal updates Compliance &Regulation Team
• Head Teacher/Principal sends email to Head of Quality and Head of Policy regarding any gaps in staff practice which will lead to a revision of policy |

| Upon conclusion of S47 | • Head Teacher/Principal updates Regional Director & Compliance and Regulation Team with outcomes and lessons learned
• DSL to communicate with identified staff to update the student's plans including risk assessments of students involved
• Head Teacher/Principal to E-mail Head of Quality and Head of Policy of any gaps in practice
• Head Teacher/Principal to inform DBS and regulatory body of any staff gross misconduct and the outcome of any disciplinary action
• If a member of staff leaves before completion of any disciplinary process the hearing will continue in their absence and DBS/regulatory body will be informed of outcome |