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PERSON/S RESPONSIBLE:

- ✓ Designated Safeguarding Lead
- ✓ SLT
- ✓ All staff

SAFEGUARDING POLICY & PROCEDURE INCLUDING PREVENT (Making a Disclosure in the Public Interest)

AUTHOR: Michele Andrews

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APPROVED BY: Dean Smith

SIGNATURE: Dean Smith
Dean Smith (Mar 16, 2022 17:32 GMT)

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1 INTRODUCTION

- 1.1 Primary Goal provides opportunities for young people and adults to learn new skills, gain confidence and maximise their potential. The learning programmes we deliver help young people and adults prepare for the world of work and give many adults employed in elementary positions their first formal qualifications. Promoting safe working practices and an understanding of rights and responsibilities at work are key components of all learning programmes.
- 1.2 The Company’s Safeguarding & Prevent policies are distributed to all personnel including consultants, who have a duty of care to safeguard young people and vulnerable adults whilst employed by Primary Goal and a legal obligation to prevent them from being drawn into terrorism.
- 1.3 Working Together to Safeguard Children (2018) defines safeguarding as;
- protecting children from maltreatment;
 - preventing impairment of children's mental & physical health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
 - taking action to enable all children to have the best outcomes.

- 1.4 PREVENT is part of CONTEST, the Government’s Counter Terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The Prevent strategy has three main objectives:
- 1.4.1 to respond to the ideological challenge faced from terrorism and aspects of extremism, and the threat faced from those who promote these views
 - 1.4.2 to provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
 - 1.4.3 to work with a wide range of sectors where there are risks of radicalisation that needs to be dealt with.
- 1.5 As part of the Prevent Strategy, Primary Goal has a duty to have “due regard to the need to prevent people from being drawn into terrorism.”
- 1.6 The Prevent Duty: Guidance for further education institutions in England and Wales (2015) defines our role as helping prevent people being drawn into terrorism (violent and non-violent extremism), which can create an atmosphere conducive to terrorism and can popularise views which terrorist exploit.
- 1.7 Extremism is defined in the Prevent Strategy as: “vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.” This also includes calls for the death of members of the British armed forces.
- 1.8 Prevent also encourages promotion of the nine protected characteristics under the Equality Act 2010 (age; disability; gender reassignment; marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex; sexual orientation).
- 1.9 If an individual is identified as vulnerable to extremism, they would be referred through the Channel process. This process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism.
- 1.10 Primary Goal understands there are two main aspects to safeguarding, and promoting welfare of learners in the context of their work;
- ✓ minimising risks, and
 - ✓ having arrangements in place to address concerns
- 1.11 The aim of this policy is to define actions and behaviours expected by Primary Goal employees and consultants to ensure all learners are safeguarded against harm and abuse.
- 1.12 This policy should be read in conjunction with the following, all of which are accessible on the internal SharePoint. A copy of each of these policies is also available to everyone on the Primary Goal website: <https://primarygoal.ac.uk/policies>
- 1. Equality and Diversity policy
 - 2. Health & Safety policy
 - 3. Safer Recruitment policy

2. STATUTORY FRAMEWORK

- 2.1 Primary Goal recognises its duty to work with other agencies to protect children & vulnerable young people from harm and to respond to safeguarding concerns.
- 2.2 In the management of its programmes, the discharge of its functions, and in implementing this Policy and Procedure, Primary Goal will remain mindful of its duty of care and other legal obligations such as those it owes under the Health and Safety at Work Act 1974, the Data Protection Act 2018, the Safeguarding Vulnerable Groups Act 2006, the Equality Act 2010, the Protection of Freedoms Act 2012 and the Counter Terrorism and Border Security Act 2015.

In the case of learners under 18, the following legislation and guidance is also relevant:

Working Together to Safeguard Children (2018) and Keeping Children Safe in Education (2021).

During the induction stage of their employment, personnel are required to commit to understanding their responsibility for safeguarding by reading and formally acknowledging this policy and the Keeping Children Safe in Education Part 1 document issued by the Dept for Education. Personnel are also required to complete the Home Office Prevent training module to be able to understand their responsibilities around the Prevent agenda.

- 2.3 To outline the policy on responding to concerns regarding and the safeguarding of children and vulnerable adults we will:
- ✓ Define roles and responsibilities with regards to Safeguarding
 - ✓ Ensure we practise safe recruitment in checking the suitability of staff, contractors and volunteers who have access to children or vulnerable adults by means of an enhanced Disclosure & Barring Service (DBS)
 - ✓ Raise employee awareness of Safeguarding and Prevent issues such as; minimising risk, recognising abuse, treating all learners with respect, and understanding the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups
 - ✓ Equip learners with the skills needed to keep themselves safe in the workplace
 - ✓ Provide clear, comprehensive, easily understood procedures for dealing with allegations of abuse and requests for help and support on a confidential basis
 - ✓ Establish a safe environment for all employees and learners
 - ✓ Work in partnership with local Safeguarding Boards and other Child Protection Agencies, where applicable
- 2.4 Primary Goal is committed to providing a learning environment where young people and adults have the right to be safe, secure, and free from threat and protected from abuse. Primary Goal has zero tolerance of abuse and other harmful behaviours and recognises that safeguarding and the promotion of safe behaviour is part of our core business. We aim to do this by:
- ✓ Ensuring all staff and volunteers are DBS checked, receive appropriate training and abide by our codes of conduct
 - ✓ Providing clear, comprehensive, easily understood procedures for dealing with allegations of abuse or requests for confidential help
 - ✓ Responding swiftly and appropriately to suspicions or allegations of abuse, including following standard reporting processes
 - ✓ Providing opportunities for learners and carers to voice any concerns they may have
 - ✓ Promoting the concept of the Safe Learner
 - ✓ Annually reviewing policies and procedures regarding safeguarding and prevent

- ✓ Reviewing the effectiveness of policy and procedures where there has been a safeguarding or prevent concern
- 2.5 The welfare of children and vulnerable adults is everyone’s responsibility. Primary Goal does not investigate individual child protection or vulnerable adult cases or referrals. Primary Goal employees are expected to follow the procedures in this policy to ensure that all allegations or suspicions of abuse or significant harm to a child or vulnerable adult are reported to the relevant statutory agency. We will share all relevant information with the respective statutory agencies (Social Services, Police and / or Channel).

3 CHILDREN AND VULNERABLE ADULTS

- 3.1 As a Further Education provider Primary Goal is legally required to safeguard and promote the welfare of children and vulnerable adults. A child is legally defined as any person who is under the age of 18 years. A vulnerable adult is a person who is 18 years or over, and who is or may need community care services. The main categories of adults covered by this definition are:
- ✓ Adults with a learning disability
 - ✓ Adults who have physical or sensory impairments
 - ✓ Adults who have mental illness including dementia
 - ✓ Adults who are old and frail
 - ✓ Adults detained in custody or under a probation order
 - ✓ Adults who are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker).
- 3.2 As a provider of training programmes for unemployed and employed learners, Primary Goal employees and learners will meet vulnerable adults and young children. All employees are trained to recognise that a proportion of our learners may be recent immigrants and therefore vulnerable because of language difficulties, potential discrimination, and racial abuse, or have a poor understanding of their rights and responsibilities at work.

4. PRIMARY GOAL LEARNERS

- 4.1 Safeguarding and Prevent forms part of the onboarding process for learners and is built into the curriculum at sequential stages of the apprenticeship programme. Work-based Coach are responsible for the delivery of awareness coaching in the workplace to apprentices to ensure they have a full understanding of keeping themselves safe, e-safety, prevention of abuse including sexual harassment, County lines, radicalisation & British values etc.
- 4.2 Work-based Coach are also responsible for educating apprentices in understanding how they could be drawn into radicalisation. It is the Coach’s responsibility to identify changes in behaviour or vulnerabilities of the learners that could be indicator of abuse, and to report their concerns to the Safeguarding team. Learners with requiring additional learning support are also contacted by the Safeguarding lead prior to onboarding ensure the learner is aware of the Safeguarding procedure for reporting a cause for concern, this is also outlined in a copy of the Apprentice Handbook which they are given upon commencement of the apprenticeship.

5 SPECIFIC ROLES AND RESPONSIBILITIES CONCERNING SAFEGUARDING

- 5.1 All Primary Goal personnel undertake online Safeguarding & Prevent training modules. These modules are certified, and documents are held on the IMPROVE training portal. The Safeguarding and Prevent policies are reviewed annually or sooner if updates are released by the Department for Education. All personnel receive CPD sessions to support the updates released by the Government which are documented in the Safeguarding training file. The company holds regular Standardisation meetings and Safeguarding and Prevent are standard items on the agenda.
- 5.2 The process for raising, recording, and investigating concerns is outlined in the Apprentice and Employer handbook.
- 5.3 All personnel are trained in the process for reporting a cause for concern and the Safeguarding team are trained to a minimum of level 3 to be able to competently deal with and conclude a concern. A copy of the cause for concern process is included in Appendix A.
- 5.3 All concerns are documented in protected files, discussed in quarterly Safeguarding meetings and form part of the monthly Board reporting process.

Primary Goal Designated Safeguarding Lead is:

Michele Andrews, michele.andrews@primarygoal.ac.uk

The Designated Safeguarding Lead will:

- ✓ Report recommendations for changes to the Company Safeguarding Policy and Procedures considering legislative changes to the Board of Directors
- ✓ Undertake regular and appropriate training for this role
- ✓ Make the decision to investigate any allegations or concerns about abuse
- ✓ Address any immediate protection issues
- ✓ Carry out any internal investigations regarding Safeguarding
- ✓ Make the decision to refer to an appropriate statutory agency (Police, Social Services and / or Channel)
- ✓ Liaise with Local Safeguarding Board
- ✓ Ensure employees are trained on Company Safeguarding procedures
- ✓ Source appropriate external training for Safeguarding

The Designated Safeguarding Officer will: -

- ✓ Undertake regular and appropriate training for this role
- ✓ Refer any decision to investigate any allegations or concerns about abuse to the Safeguarding Lead
- ✓ Address any immediate protection issues in the absence of the Safeguarding Lead
- ✓ Carry out any internal investigations regarding Safeguarding

5.2 **Managers will:**

- ✓ Ensure that this Policy is brought to the attention of all their employees;
- ✓ Ensure that the Policy and associated procedures are implemented effectively;
- ✓ Ensure that risks are assessed and that appropriate risk reduction measures are developed for all work tasks and activities;

- ✓ Ensure their employees have appropriate instruction, training, and development to enable them to fulfil their Safeguarding and Prevent responsibilities and to work safely
- ✓ Monitor the performance of their own employees to ensure Policy requirements and Company standards are being met;
- ✓ Ensure that all incidents of suspected or alleged abuse are reported;
- ✓ Set a good example and promote responsible attitudes among employees and learners.

5.3 **All employees, contractors and volunteers will:**

- ✓ Be alert to signs of abuse and extremism and take responsibility for referring concerns to the Primary Goal Safeguarding Team and the Apprentice's employer
- ✓ Be prepared to listen to and take seriously the concerns of learners and carers
- ✓ Abide by the codes of conduct for Primary Goal employees and volunteers
- ✓ Promote the health, safety, and welfare of learners
- ✓ Maintain records as necessary
- ✓ Set a good example to learners by their own behaviour

5.4 **Recruitment**

Primary Goal adhere to the company Safer Recruitment Policy which is designed with the aim of safer selection and recruitment of employees to provide a safe environment for children/young people and vulnerable adults to learn in.

5.5 **Training**

Training on Safeguarding will be provided so that, as a minimum, all employees have knowledge and understanding of the following:

- ✓ Main forms of abuse & definitions
- ✓ Recognising abuse
- ✓ Responding to allegations of abuse
- ✓ Exemplifying British values
- ✓ Encouraging students to respect other people about the protected characteristics set out in the Equality Act 2010
- ✓ Recognising factors that make people vulnerable to being drawn into terrorism
- ✓ To challenge extremist ideas and be aware of what action to take in response
- ✓ Understanding of when to make referrals to the Channel programme and where to get additional advice and support
- ✓ Codes of conduct expected by employees

The above combined with our training on the processes for raising, recording and investigating any concerns and issues ensures that all apprentices are protected.

5.6 **Safeguarding Representatives**

In addition, Safeguarding Representatives will:

- ✓ Attend Introduction to Safeguarding training provided by the Local Safeguarding Boards and refresher training as appropriate

5.7 Designated Safeguarding Lead/ Designated Safeguarding Officer

In addition, the Designated Safeguarding Lead and Designated Safeguarding Officer will:

- ✓ Attend training provided by the Local Safeguarding Boards and refresher training as appropriate (but as a minimum every 2 years) to cover as a minimum:
 - Introduction to Safeguarding
 - Working Together
 - Common Assessment Framework
 - Child Protection Level 3 (or equivalent)
- ✓ Complete training, and subsequent refresher training on the Prevent Strategy
- ✓ Update Continuous Professional Development (CPD)

5.8 Subcontracted provision

Primary Goal does not currently subcontract provision for other organisations to deliver on behalf of Primary Goal (subcontractors). Should it do so they will be made aware of this policy. If the organisation has its own safeguarding procedures these will be reviewed by the Safeguarding Lead for appropriateness and audited for effectiveness. If they do not meet the required standard, subcontractors will need to abide by Primary Goal policies and procedures for Safeguarding.

6 RELATIONSHIPS WITH YOUNG PEOPLE AGED 16 – 17

- 6.1 It should be noted that, whilst a young person can consent to sexual activity once they reach the age of 16, the Sexual Offences (Amendment) Act 2003 makes it a criminal offence for a person to engage in any sexual activity with a person under 18 where the adult is in a position of trust. This applies to employees and learners even if they do not work together directly.

7 INTERNET SAFETY

(Employees should also refer to the relevant section of the Employee Handbook on the IMPROVE training portal)

- 7.1 When using the internet for learning activities Work-based Coach are required to:

- ✓ Educate learners in e-safety practice, e.g., not sharing personal information or inappropriate communication with strangers
- ✓ Ensure that learners know how and to whom e-safety incidents should be reported
- ✓ Undertake only professional related communication directly with learners
- ✓ Primary Goal staff are required not use personal mobile phones or email accounts to communicate with learners. Staff should not 'follow' or 'friend' learners on social media sites other than through the Primary Goal Facebook page and Twitter account.

- 7.2 The Primary Goal network is protected by Senso.Cloud software. This monitors learners' keystrokes and is used to alert the Designated Safeguarding Lead to any safeguarding or prevent risks. In the case of emergency, it can also be used to lock down IT equipment and display emergency instructions.

8 SAFEGUARDING CONCERNS

- 8.1 Primary Goal employees may become aware of abuse in number of ways. A learner may tell an employee directly about abuse that has taken place. This is known as a disclosure. Concerns may be reported by a third party or the employee themselves may notice something relating to the safety of a learner which is causing concern.
- 8.2 Primary Goal employees may encounter Safeguarding concerns for children or vulnerable adults whilst undertaking their duties on employers' premises.
- 8.3 The concern may relate to what is (or may be) happening within the organisation or what is (or may be) happening outside that organisation (for instance in their own home).
- 8.4 The concern may be brought to our attention by the learner themselves, alleged by others or through direct observation.
- 8.5 The concerns may be about the behaviour of any of the following:
- ✓ Member of staff of another organisation
 - ✓ Peer
 - ✓ Person from the community (for instance relative or friend)
 - ✓ Member of Primary Goal
- 8.6 The concern may be about a current situation or past events and may be about allegations or disclosures of physical abuse, sexual abuse, emotional abuse or neglect, or a combination of any of these.
- 8.7 Any of Primary Goal employees, volunteers or consultants could receive such information. In all circumstances, they must respond in accordance with the procedures laid out below.
- 8.8 If the learner requires medical attention or police presence is needed staff must contact emergency services before continuing this process.

9 OBSERVATIONS OF SIGNS OF ABUSE

- 9.1 You may observe signs that lead you to suspect that a learner may have been physically, emotionally, or sexually abused, or suffer severe neglect, or are becoming radicalised; or in addition in the case of a vulnerable adult, they may be experiencing financial, discriminatory, or institutional abuse.
- 9.2 Lists of signs of abuse are included in Appendix 2 for your information. In addition to these a person may be being abused by their race, gender, age, disability, or sexual orientation which would indicate discriminatory abuse. Similarly, any of the examples listed may be an indication of institutional abuse if the individual is in receipt of organised care.
- 9.1 It is not your responsibility to investigate what has happened or to establish whether abuse has taken place.

Your responsibilities are to:

- ✓ Seek advice and support from the Designated Safeguarding Representative regarding your concerns.

- ✓ The Designated Safeguarding Representative will advise on the most appropriate next steps
- ✓ The Designated Safeguarding Representative will report to the Designated Safeguarding Lead before any decisions are taken regarding referring to the Police, Social Services or any other external agency.

10 DISCLOSURES

10.1 If a learner or employee discloses to you that they (or indeed another child/young person or vulnerable adult) have been or are being abused/radicalised you should take the following action immediately.

You should:

- ✓ Be supportive
- ✓ Take what the child or vulnerable adult says seriously
- ✓ Remain calm
- ✓ Reassure them that it was right to tell someone and acknowledge it was brave of them to do so
- ✓ Use language they understand
- ✓ Explain what will happen next, i.e., that disclosure of relevant information may need to be made to the Designated Safeguarding Lead
- ✓ Write down verbatim immediately afterwards what was said, including the time, place and any other observations
- ✓ This information must be submitted via the Cause for Concern Form within 24 hours to the Designated Safeguarding Lead. You must also sign and date the form
- ✓ Keep all records confidential

You should not:

- ✓ Panic
- ✓ Delay
- ✓ Promise to keep secrets
- ✓ Ask leading questions
- ✓ Ask them to repeat the story unnecessarily
- ✓ Express any opinions about what you are told
- ✓ Discuss the disclosure with anyone other than the Designated Safeguarding Representative
- ✓ Start to investigate
- ✓ Contact the alleged abuser

Employees, consultants, and volunteers at Primary Goal should not engage in social events with students except those organised by Primary Goal

11 RECORD KEEPING

- 11.1 A confidential record will be kept of all cases referred to the Designated Safeguarding Team, including details of cases referred to the Local Authority or the police. These written records will be kept securely for a period of six years via a restricted site on Primary Goals Staff Portal system, with any paper information held securely by the Designated Safeguarding Lead.

12 INFORMATION SHARING

- 12.1 Personal information about learners is treated with respect and confidentiality. Consent will be sought to share personal information. However, information can be shared without consent when:

- ✓ Asking for consent will increase the risk of harm to a child or vulnerable adult or;
- ✓ A delay in sharing information may increase the risk of harm to a child or vulnerable adult

More information can be found at: HM Government (2018) Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents, and carers.

- 12.2 The Safeguarding team has links with the local safeguarding boards/authorities in the areas where learners are located and are aware of the referral procedure for multi-agency support & Channel where necessary and a process is in place for the sharing of information.

- 12.3 Below are the local authority links for Coventry which is the main point of reference for Primary Goal's safeguarding team: -

https://www.coventry.gov.uk/info/233/coventry_safeguarding_adults_board/2414/coventry_safeguarding_adults_board

<https://coventrychildcare.proceduresonline.com/>

13 CONCERNS ABOUT THE BEHAVIOUR OF A COLLEAGUE

- 13.1 The welfare of a child or vulnerable adult is paramount and employees should not allow feelings of loyalty to colleagues to interfere with their judgement when there are concerns about a colleague's behaviour. If you have concerns about the behaviour of a colleague you should;

- ✓ Complete the Cause for Concern Form (available on SharePoint)
- ✓ Report the concerns to the Designated Safeguarding Lead or Designated Safeguarding Officer as soon as possible but within 24 hours

- 13.2 The person concerned will be asked to stay away from activities pending the conclusion of an investigation.

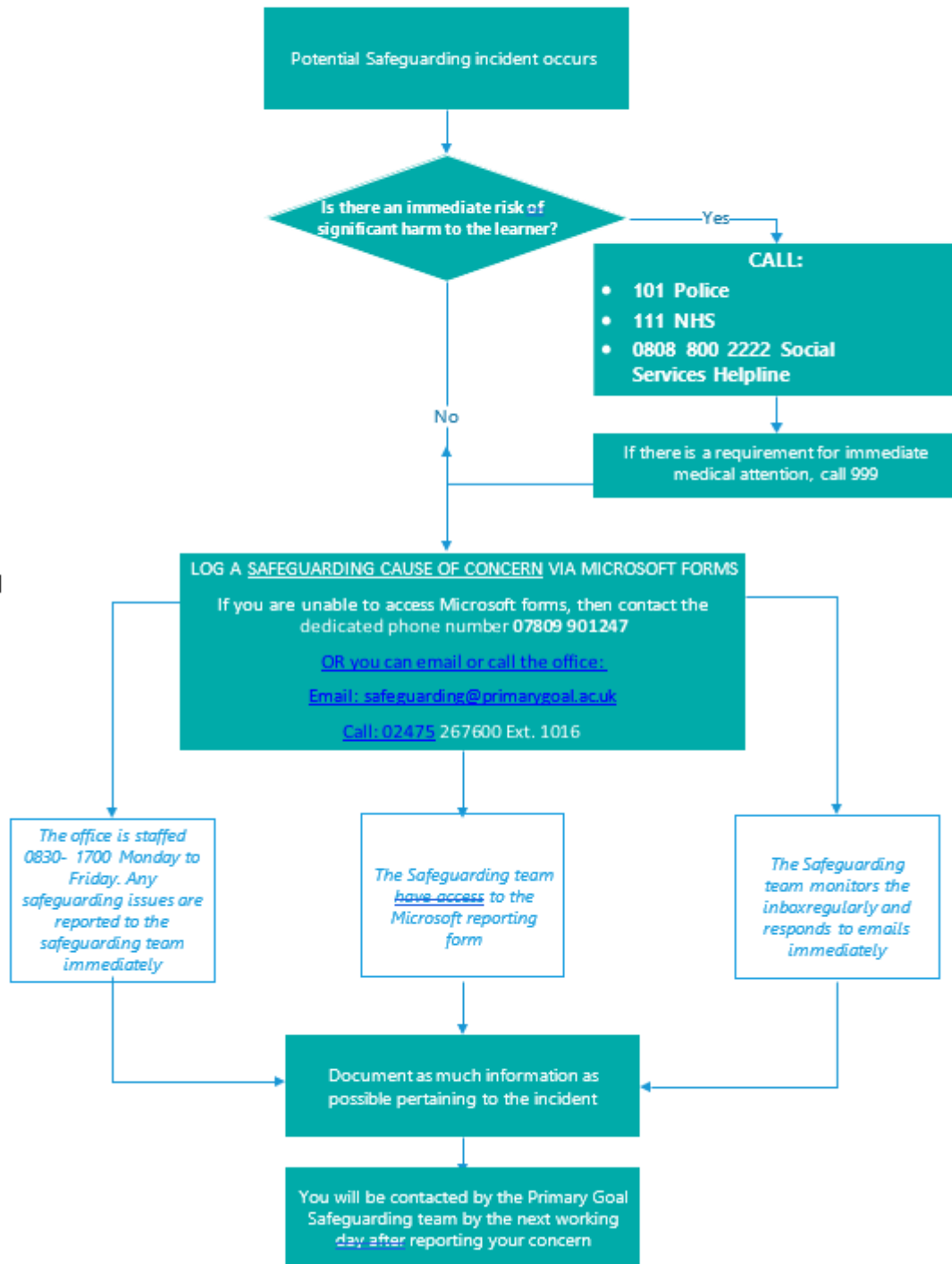
- 13.3 The Designated Safeguarding Lead will decide whether to contact Social Services the Police and / or Channel.

13.4 The person concerned will be kept informed of the timescales and progress of the investigation.

14 APPENDIX A- REPORTING A SAFEGUARDING INCIDENT OR CAUSE FOR CONCERN



Safeguarding – Reporting a Safeguarding Incident



Types of Abuse

The following definitions are taken from Working Together to Safeguard Children (DfES: 2018)

Abuse and Neglect

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

Physical Abuse

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

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a prominent level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child Sexual Exploitation

Child Sexual Exploitation is a form of sexual abuse where young people are exploited for money, power, or status. It can occur directly or using technology. Young people may be groomed online through social media sites and apps including dating apps.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in the UK. Cases of where FGM is reported to have taken place or concerns that it might take place should be treated as a safeguarding issue. Although most cases of FGM are thought to take place between the ages of 5 and 8 years, it should be recognised that FGM can occur at any time, for example on reaching adulthood or before marriage.

Radicalisation

Radicalisation is the process by which individuals come to support terrorism or violent extremism. Young people may express extremist ideas, be in possession of extremist literature or express extremist views. They may associate with known extremists or seek to recruit others to an extremist ideology. Concerns that a learner's behaviour indicates involvement with extremist ideas should be considered a safeguarding issue and reported as such.

Forced Marriage

Forced marriage is a marriage in which one or both partners do not consent to the marriage and are coerced into it. Coercion can be physical, emotional, or financial. It also applies to vulnerable adults who may not have the capacity to consent to the marriage. People who are forced to marry or fear they might be forced to marry can go missing from education.

The Concept of Significant Harm

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 2004 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children and gives local authorities a duty to make enquiries to decide whether they should act to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

A court may make a care order (committing the child to the care of the local authority) or supervision order (putting the child under the supervision of a social worker or a probation officer) in respect of a child if it is satisfied that:

- the child is suffering, or is likely to suffer, significant harm; and
- the harm, or likelihood of harm, is attributable to a lack of adequate parental care or control.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. Each of these elements has been associated with more severe effects on the child, and/or greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm, for example, a violent assault, suffocation, or poisoning. More often, significant harm is a compilation of noteworthy events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical, or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the child's own assessment of his or her safety and welfare, the family's strengths and supports, as well as an assessment of the likelihood and capacity for change and improvements in parenting and the care of children and young people.

Types of Abuse in the Context of Vulnerable Adults

In addition to definitions provided above, in the context of vulnerable adults the following outlines the main forms of abuse:

Physical Abuse

Includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions

Sexual Abuse

Includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressure into consenting

Psychological Abuse

Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks

Financial or Material Abuse

Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits

Neglect and Acts of Omission

Includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating

Discriminatory Abuse

Includes racist, sexist, that based on a person's disability, and other forms of harassment, slurs, or similar treatment

Internet/Electronic Abuse

The use of modern communication technologies (e.g., internet, text or video messaging, email, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate, or bully an individual to gain power and control over them.

Signs and Indicators of Abuse and Extremism

It is important to note that abuse can:

- ✓ Consist of a single act or repeated acts;
- ✓ Be intentional or unintentional or result from a lack of knowledge;
- ✓ Be an act of neglect, an omission, or a failure to act;
- ✓ Cause harm temporarily or over a period;
- ✓ Occur in any relationship;
- ✓ Be perpetrated by anyone, individually or as part of a group or organisation;
- ✓ Often constitute a crime, i.e., physical, sexual abuse, e.g., downloading or using pornographic images of children and/or storing them on Company computers or equipment.

There are several factors that make individuals more likely to be vulnerable to exploitation by extremist, sexual exploitation, or other forms of exploitation. Factors that may contribute to vulnerability include:

- ✓ Being rejected by peer, faith, or social group/family
- ✓ Pressure from persons linked to extremism
- ✓ Victim or witness to race or religious hate crime
- ✓ Conflict with family over religious beliefs/lifestyle/politics
- ✓ Identity confusion
- ✓ Recent religious conversion
- ✓ Under-achievement
- ✓ May possess literature related to extreme views
- ✓ Experience poverty, disadvantage, or social exclusion
- ✓ Extremist influences
- ✓ A series of traumatic events - global, national, or personal.

Possible Signs of physical abuse include:

- ✓ Unexplained injuries or burns, particularly if they are recurrent
- ✓ Fear of medical help
- ✓ Refusal to discuss injuries
- ✓ Aggression/bullying
- ✓ Improbable explanations for injuries
- ✓ Over compliant behaviour or a 'watchful' attitude
- ✓ Untreated injuries or lingering illness not attended to
- ✓ Running away
- ✓ Admission of punishment which appears excessive
- ✓ Notable change in behaviour without explanation
- ✓ Shrinking from physical contact
- ✓ Deterioration of work
- ✓ Fear of returning home or of parents being contacted
- ✓ Fear of Undressing
- ✓ Unexplained pattern of absence which may service to hide bruises or other physical injuries

Possible Signs of emotional abuse include:

- ✓ Continual self-deprecation
- ✓ 'Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on
- ✓ Fear of new situations
- ✓ Air of detachment – 'don't care' attitude
- ✓ Inappropriate emotional responses to painful situations
- ✓ Social isolation – does not join in and has few friends
- ✓ Self-harm or mutilation
- ✓ Desperate attention-seeking behaviour
- ✓ Compulsive stealing/scrounging
- ✓ Eating problems, including overeating and lack of appetite
- ✓ Drug/solvent abuse
- ✓ Depression, withdrawal

Possible Signs of sexual abuse include:

- ✓ Bruises, scratches, burns or bite marks on the body
- ✓ Promiscuity, prostitution, provocative sexual behaviour
- ✓ Scratches, abrasions, or persistent infections in the anal or genital regions
- ✓ Self-injury, self-destructive behaviour, suicide attempts
- ✓ Sexual awareness inappropriate to the person's age – shown, for example, in drawings, vocabulary, games and so on
- ✓ Pregnancy – particularly in the case of young adolescents who are evasive concerning the identity of the father
- ✓ Recoiling from physical contact
- ✓ Frequent public masturbation
- ✓ Eating disorders
- ✓ Attempts to teach others about sexual activity
- ✓ Tiredness, lethargy, listlessness
- ✓ Refusing to stay with certain people or to go to certain places
- ✓ Over-compliant behaviour
- ✓ Genital discharge/irritation
- ✓ Aggressiveness, anger, anxiety, tearfulness
- ✓ Sleep disturbance
- ✓ Withdrawal from friends
- ✓ Unexplained gifts of money
- ✓ Depression
- ✓ Changes in behaviour

Possible signs of neglect include:

- ✓ Constant hunger
- ✓ Low self-esteem
- ✓ Poor personal hygiene
- ✓ Poor social relationships
- ✓ Inappropriate clothing
- ✓ Compulsive stealing or scrounging
- ✓ Frequent lateness or non-attendance at place of learning
- ✓ Constant tiredness
- ✓ Untreated medical problems

Signs of financial abuse include:

- ✓ Loss of jewellery and individual property
- ✓ Lack of money to purchase basic items
- ✓ Misuse of benefits
- ✓ A bill not being paid when money is entrusted to a third party
- ✓ Inadequate clothing
- ✓ Theft of property
- ✓ Over protection of money or property
- ✓ Unexplained withdrawal of cash
- ✓ Loss of money from a wallet or purse

17 APPENDIX D - SOURCES OF FURTHER INFORMATION AND ADVICE

<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

<http://www.legislation.gov.uk/ukpga/2006/47/section/2>

<http://www.legislation.gov.uk/ukpga/2010/15/contents>

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<http://www.legislation.gov.uk/ukpga/1989/41/contents>

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

18. REVIEW

Primary Goal will review this Policy annually. The review will be undertaken by the Management Team, with a nominated member of the Governance Board or Management Team responsible for leading the review.