

SAFEGUARDING POLICY

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1. Purpose

This policy outlines the responsibilities of Always Consult in relation to the protection of children, young people and vulnerable adults and will give due regard to:

- The Children Act 1989 & 2004
- The Protection of Children Act 1999
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education (annually updated)
- Data protection act 1998 / General Data Protection Regulations (GDPR) 2018
- The Care Act 2014
- Prevent Duty 2015
- The Education Act (2002) Section 175
- The Sexual Offences Act 2003
- The Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012
- Equality Act 2010
- Human Rights Act 1998
- DBS Code of Practice November 2015
- Counter-Terrorism and Security Act 2015
- Domestic Abuse Act 2021

2. Scope

Always Consult is dedicated to the health, safety, and welfare of all children, young people and vulnerable adults involved in courses or activities which come under the responsibility of the company. We recognise that we have a fundamental responsibility to provide an environment in which individuals of all ages, whether staff, student, learner or visitor, may work, learn and develop in a safe environment.

This policy covers all Always Consult staff, associates and learners whether they are based on site, working remotely or in a workplace learning environment. It is the responsibility of all staff to understand their role in supporting safeguarding across all aspects of provision and for familiarising themselves with the appropriate procedures and other policies that support this overarching document for example:

- Whistleblowing
- Safe Recruitment
- Health and Safety
- Always Consult Employee Handbook

Training and Education providers such as Always Consult are not subject to legal safeguarding duties regarding children and vulnerable adults in the same way that schools, further education colleges, local authorities, and care providers are. However, Always Consult delivery includes apprenticeships and as such welcomes OFSTED requirements to ensure effective procedures for keeping learners and vulnerable adults safe from abuse, neglect and exploitation. Always Consult will follow best practice by putting all

reasonable structures in place to support safeguarding and will take all concerns seriously, respond to concerns promptly and refer to the local authority and/or police as appropriate. Always Consult will also follow guidelines for safeguarding as directed by the Apprenticeships Standards.

For the purposes of this policy Apprentices will be referred to as 'Learners'.

3. Aim of the Policy

The main aim of this policy is to ensure that staff are fully engaged in being vigilant about raising awareness; that they overcome professional disbelief that such issues will not happen at Always Consult and ensure we work alongside other professional bodies and agencies to ensure that our learners and staff are safe from harm.

Further aims of this policy are;

- To ensure relevant and effective safeguarding practices are in place.
- To ensure the right of every applicant and learner to learn within a safe environment.
- To promote awareness to staff of the need to safeguard children and vulnerable adults and to recognise safeguarding is everyone's responsibility.
- To raise awareness of different types of abuse.
- To provide guidelines for staff in handling matters relating to actual or suspected abuse.
- To ensure staff act professionally.
- To prevent the risk of abuse by ensuring procedures and standards are in place.

The policy provides guidance on our internal procedures, but acknowledges that it may be appropriate in certain circumstances to report safeguarding concerns about children or adults at risk to a range of external agencies

Safeguarding

The term 'safeguarding' embraces both child and vulnerable adult protection and preventative approaches to keep our learners, staff and employers safe. This policy will refer to the following definitions:

Child: References to "child" or "children" in this policy means anyone under the age of 18 years.

Safeguarding Children: In defining our approach towards children, Always Consult draws on the definition used by the DfE in Keeping Children Safe in Education (KCSiE). While KCSiE only applies to Schools and Colleges¹, we will play our part in:

- Protecting children from maltreatment.
- Preventing impairment of children's mental health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

¹college' means further education colleges and sixth-form colleges as established under the Further and Higher Education Act 1992 and institutions designated as being within the further education sector. College also means providers of post 16 Education as set out in the Apprenticeships, Skills, Children and Learning Act 2009 (as amended)³: 16-19 Academies, Special Post-16 institutions and Independent Training Providers

Safeguarding Adults at Risk: While Always Consult is not subject to the provisions of the Care Act 2014, the company draws broadly on this act to inform its policy on safeguarding Adults at Risk. We will play our part to:

- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.
- Ensure that the wellbeing of the Adult at Risk is promoted and that in deciding on any action to be taken we will take into account their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

Prevent

Another aspect of safeguarding is the Prevent Duty, which requires the Education sector to have "due regard to the need to prevent people from being drawn into terrorism", supporting terrorism or being drawn into non- violent extremism.

- Prevent aims to safeguard vulnerable individuals (both adults and children) who may be at risk of potentially becoming involved in terrorist activities.
- It also aims to support institutions, such as schools, colleges, and universities where this may happen.
- All frontline staff have a responsibility to report any instances where they think they have identified a Safeguarding issue to the DSL

Further information on Prevent is located in Appendix B.

4. Our Commitment

Always Consult's Commitment to the Policy is obtained through:

- Having clear policies and procedures in place.
- All learners, associates and staff will know that Always Consult has policies in place to keep them safe from harm and that Always Consult regularly reviews its systems to ensure they are appropriate and effective.
- Prevent & Safeguarding being a part of the induction for staff, associates and learners and their continuous professional development.
- Learners, associates and staff are briefed during induction about how to stay safe when using the Internet. For further information regarding online safety please refer to Appendix D.
- Awareness of statutory duties towards the welfare of children and vulnerable adults and be familiar with our guidance on reporting arrangements.
- Always Consult Curriculum, promotes respect, tolerance, and diversity. Learners, associates and staff are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.
- The training received is continually reviewed to ensure the most appropriate and up to date training is given aligning with statutory requirement.
- Periodic updates surrounding key safeguarding concepts are communicated via the internal communication channels.

- Staff are made aware of the types of abuse and the signs and indicators abuse (Appendix C)
- All staff are requested to read Keeping Children Safe in Education (Part 1).
- Learners and employers will receive confidential advice, guidance and support for a range of issues that they may face. They will be signposted to external agencies where specialist support is required.
- Always Consult has established and will regularly review procedures for reporting suspected abuse taking account of any new government legislation, regulations or best practice documents to ensure staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children.
- Always Consult will deal with any allegations of abuse by staff according to the Company Disciplinary Procedures as appropriate
- Employee recruitment in line with safer recruitment as all appointments are subject to satisfactory DBS checks, references, and interviews.
- Always Consult has a statutory duty to make reports and provide relevant information to the DBS where there are grounds for believing, following an investigation, that an individual is unsuitable to work with young people or vulnerable adults, or may have committed misconduct. The responsibility for reporting cases to the DBS lies with the Designated Safeguarding Lead and the Managing Director. DBS make barring decisions for Section 142 of the Education Act (formally known as List 99), The Protection of Children and vulnerable adults and vulnerable adults Act List (PoVA) and the Protection of Vulnerable Adults List (PoVA).
- Job descriptions / Contracts make specific reference to the role and responsibilities of all employees towards upholding the principles, policy and practice of effective Safeguarding and Prevent.
- The DSL and deputy hold a formal Designated Safeguarding Lead certificate and undertake regular CPD events and standardisation meetings to keep updated with legislation and to refresh knowledge. They will then be provided with the appropriate information and training to assist them to raise awareness of safeguarding issues with stakeholders and staff as required.
- Topics are also distributed via internal communication channels to raise awareness and promote discussion in all areas under the wider safeguarding agenda including areas such as radicalisation, mental health issues, positive relationships, and staying safe on the internet, which will educate employees alongside giving greater knowledge to be passed onto learners.
- Key Individuals involved in both learner recruitment and staff recruitment complete safer recruitment training.

We shall be a company that expects everyone working with us or on our behalf, to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection, and reporting of modern slavery in any part of our organisation or

supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review.
- We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance.

5. Safeguarding Team roles and responsibilities

The Safeguarding Team comprises of the following:

Designated Safeguarding Lead (DSL) – Helen Birchall (Business Manager)

Deputy Designated Safeguarding Lead (DDSL) – Nasreen Latif (Head of Quality)

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding, as set out above, remains with the DSL. The DSL, holds strategic responsibility for the safeguarding processes and procedures and will report to the Managing Director.

The DSL will undertake an annual safeguarding audit and report findings to the Directors and Governance Board. Quarterly action plans will be devised and reviewed by the DSL and DDSL.

The DSL or DDSL should always be available to discuss any immediate safeguarding concerns. In the first instance concerns should be reported to the DSL, however should the DSL be on annual leave or not contactable then concerns should be reported to the DDSL.

The Safeguarding Team are responsible for the Hot Topics Programme and will ensure that the content is regularly reviewed and kept up to date. The programme is delivered by Skills Coaches to learners studying an apprenticeship.

The DSL and DDSL should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

The designated safeguarding lead, and/or their deputy, is responsible for:

Referrals

- Refer cases of suspected abuse or allegations to relevant statutory agencies
- Act as a source of support, advice and expertise to staff when deciding whether and when to make a referral
- Act as a source of support, advice and expertise to all learners and staff affected by a safeguarding incident Ideally seek advice from and share information with relevant statutory agencies after seeking consent or informing parents or carers of a referral, unless to do so would place the person at increased risk of harm
- Report hate crime

Training

- Ensuring that staff recognise how to identify the signs of abuse, neglect and radicalisation and when it is appropriate to make a referral to other agencies
- Ensure staff access formal safeguarding training at least every three years as well as having additional safeguarding updates provided by the DSL throughout the year.
- Ensure each member of staff has access to and understands the safeguarding policy and procedures, especially new or part-time staff who may work at different establishments and or locations
- Ensure all learners have access to and understand the organisations safeguarding policy and procedures.
- Ensure all learners and staff have induction training covering safeguarding and are able to recognise and report any concerns about safety and welfare immediately they arise
- Be able to keep detailed, accurate, secure written records of referrals and or concerns
- Obtain access to resources and attend any relevant or refresher training courses
- DSL will attend Prevent Awareness training and Channel Awareness training.

Raising awareness

- Ensure the safeguarding policy and procedures are updated and reviewed annually
- Ensure learners know that disclosures or concerns about suspected abuse or neglect may be referred to the police or social services

6. What to do if a learner discloses information or there is a concern?

Recognise

Identify that the individual at risk may be describing, or experiencing, abuse or neglect even when this may not be explicit. (Please refer to Appendix C)

Respond

Stay calm, listen and show understanding.

Do not get shocked, or ask leading questions.

Allow the individual to disclose as much as they are comfortable with.

Reassure

If an individual is disclosing then let the individual know that what they have said will be taken seriously and explain you have a duty of care to report this to a manager/DSL.

Try not to ask questions, but if you must, make sure they are open-ended questions to clarify.

It is not your role to investigate or to probe.

Record

Write a record using Always Consult Cause of Concern Report (Appendix A) within 24 hours. Ensure that this is clear and factual.

If there are any physical signs of abuse, use the body map provided on the Concerns Form.

If the learner is in immediate harm, the relevant authorities will be contacted immediately. In this situation ensure that the child or vulnerable adult is accompanied and kept safe until the relevant authorities arrive.

The DSL will record any actions on the concerns form and retain in a secure area electronically which can only be accessed by the safeguarding leads.

Please refer to the 'Action Guideline for Always Consult Staff Receiving Disclosure/Suspicion' in Appendix F

Process for learners

Any learner who has concerns about themselves, other learners, staff or their apprenticeship/work placement employer they should initially talk to/email their Tutor/Skills Coach if appropriate or directly contact one of Safeguarding Team.

We recognise that all matters relating to safeguarding and child and learner's protection are confidential. The Designated Safeguarding Lead/Officers will disclose personal information about a child or learner to other members of staff on a need-to-know basis only. However, all staff have a professional responsibility to share information with other agencies in order to safeguard children and vulnerable learners. All staff are aware that they cannot promise a child, young person or learner to keep secrets which might compromise safety or well-being or that of another.

7.Procedure for allegation of suspicion of abuse perpetrated by an Always Consult member of staff/Associate

Reporting of allegations or suspicions of abuse must be made to the Designated Safeguarding Lead
The DSL will risk assess in collaboration with the Managing Director and decide whether to refer the case to the relevant body e.g., Social Services or the Police.

The DSL together with the Senior leadership team may need to be involved with any decision to re-allocate activities due to be carried out by the person under investigation before the outcome of the investigation is known. All sensitive information will be kept secure and not disclosed to other staff in line with GDPR and confidentiality policy.

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. A formal notification should also be made to the relevant DSL who will determine

whether a safeguarding investigation is required.

If during an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, Always Consult is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of young persons or vulnerable adults, including those where the person concerned refuses to co-operate with the process. For the avoidance of doubt, where the DSL feels that a statutory referral to the Disclosure and Barring Service (DBS) is appropriate

8. Keeping yourself safe

To maintain yours and the learner's safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visiting learners at home or transporting learners to and from locations (this includes travelling in the car with a learner driving)
- Using sarcasm, insults, or belittling comments towards learners
- Personal relationships with learners

It's also important to be mindful of the following when conducting yourself:

- Staff and associates will naturally build a rapport with learners, and the learners may see you as a confident and support but be sure to maintain professional boundaries whenever carrying out work on Always Consult behalf.
- Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We can listen to their concerns and support them.
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/ examination, ensure a member of the site staff is aware where you are and monitors this.
- Be careful when giving learner advice, as this is based on your opinion. Focus support on information (facts) and guidance (signposting).
- If at any point, you feel unsafe in a learner's company inform your Line Manager.

9. Policy review

This policy must be reviewed annually unless there are any changes in legislation or guidance in the interim, in which case the policy will be updated as and when necessary.

This policy was reviewed in October 2023 by the DSL and approved by the Managing Director.

Next review is due in October 2024.

SAFEGUARDING CAUSE FOR CONCERN REPORT

Please complete this form on every occasion where there is a safeguarding cause for concern. Send the completed form to Helen Birchall (DSL) securely via Teams (not email) and telephone Helen Birchall within 24 hours to ensure it has been received 07702 803487.

1. Your details	
Name:	Job Title:
Email:	Phone:
2. Details of the person at risk	
Name:	
The person's role, organisation:	
Age:	Gender:
Address:	
Email:	Contact telephone number:
Ethnicity:	First language:
Details of next of kin/other contact:	
Has the person at risk given their consent for this concern to be raised? Yes No	
Do you think that the person at risk has the mental capacity in relation to making decisions about their safety? Yes No	
Date of concern:	Where did the incident occur?

3. Brief outline of the concern (if there are physical signs of harm please use body map provided in Appendix 1)

4. Details of the person/people alleged to have caused the harm, if known:	
1. Name:	
Age:	Gender:
Address:	Contact telephone number:
Ethnicity:	First language:
2. Name:	
Age:	Gender:
Address:	Contact telephone number:
Ethnicity:	First language:
3. Name:	
Age:	Gender:
Address:	Contact telephone number:
Ethnicity:	First language:
5. Desired outcomes	
Desired outcomes of the person at risk	
Desired outcomes of the person making the referral	
THIS SECTION TO BE COMPLETED BY THE DESIGNATED SAFEGUARIDNG LEAD	
5. Actions taken	
Name of DSL	
Date DSL informed of concern	

Action taken

Follow up required?

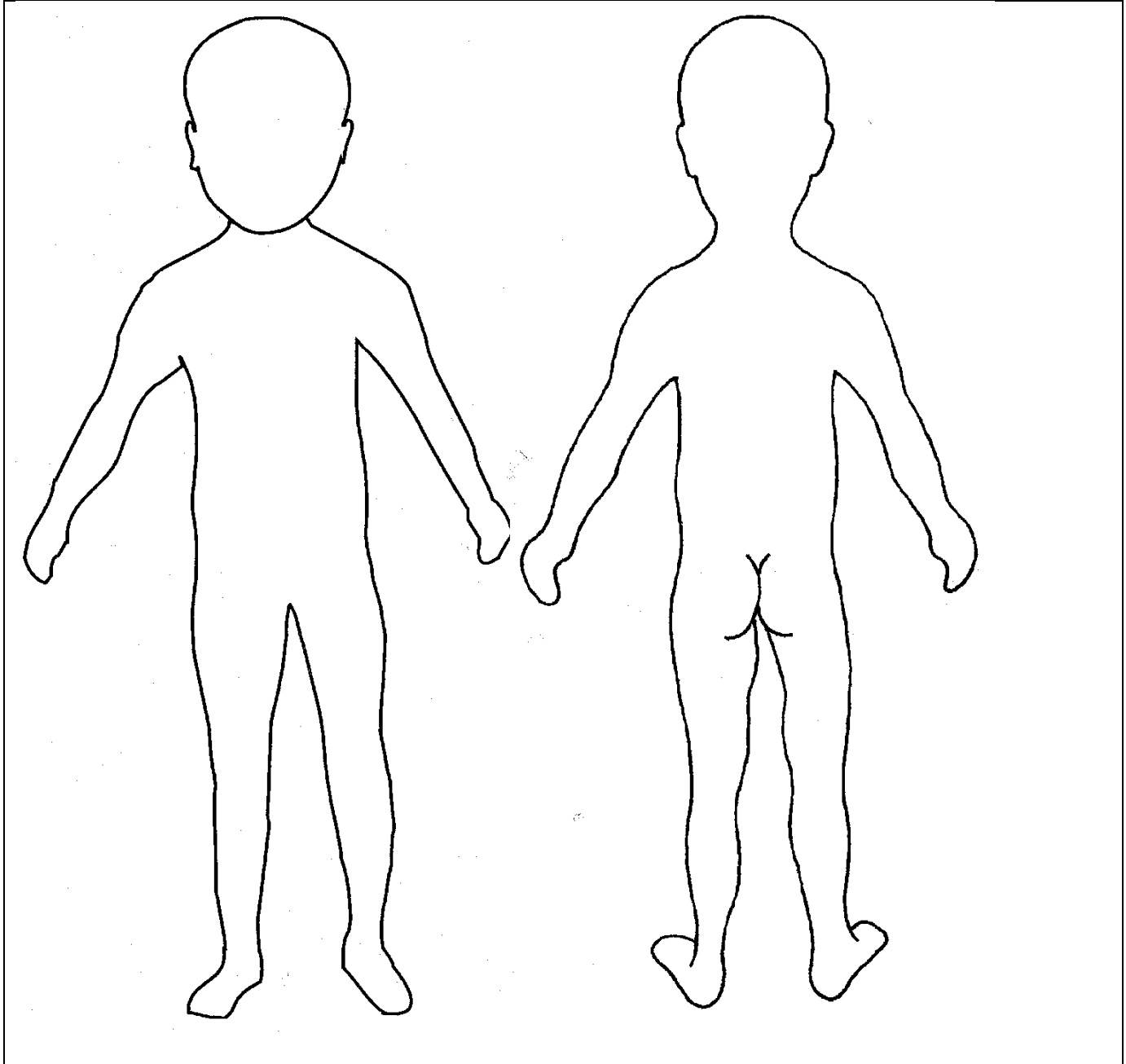
Appendix 1 Body map

This must be completed at the time of observation

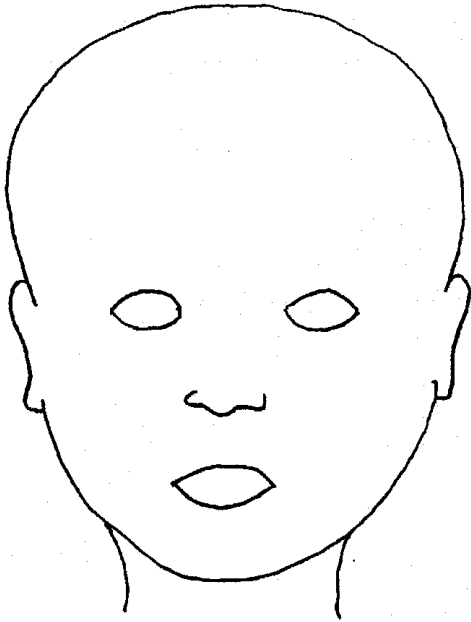
Name of person at risk: Date of birth:

Name of observer:

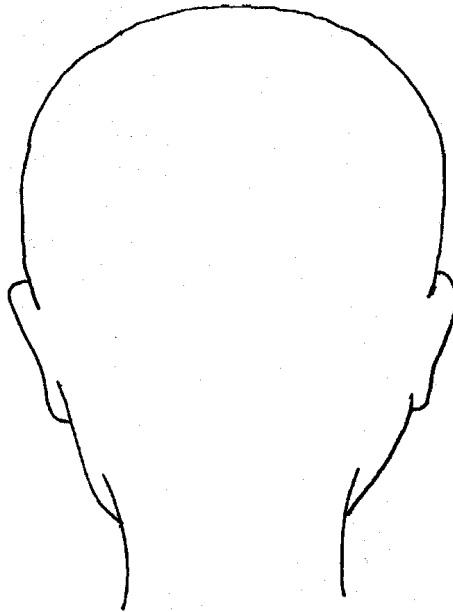
Date and time of observation:



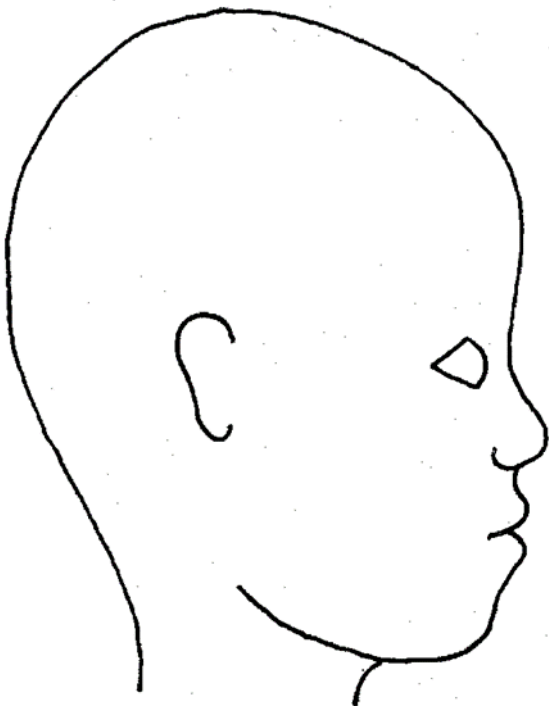
Front



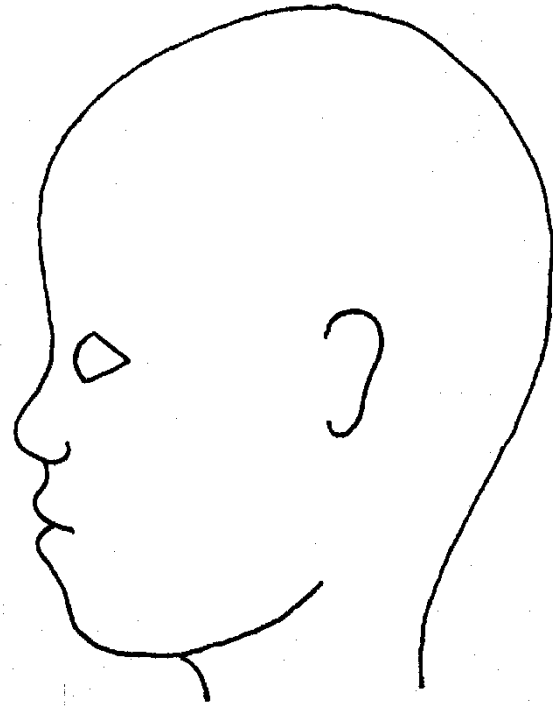
Back



Right



Left



Appendix B

Prevent

The Prevent strategy, published by the Government in 2011, is part of our overall counter-terrorism strategy, 'Contest'. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to "prevent people from being drawn into terrorism".

The 2011 Prevent strategy has three specific strategic objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address.

What is Extremism?

The Government has defined extremism 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.

What is Terrorism?

An action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

What is radicalisation?

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic, or social conditions, institutions, or habits of the mind. Extremism is defined as the holding of extreme political or religious views.

People can be drawn into violence, or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of several factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists

- Seeking to recruit others to an extremist ideology

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual Liberty
- Rule of Law
- Democracy
- Mutual Respect and Tolerance of different Faiths and Beliefs

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

At Always Consult, we are fully committed to safeguarding and promoting the welfare of all learners and staff. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability.

What is Channel?

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

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

Members of staff wishing to have an enhanced awareness of the Channel process can access training [Welcome \(prevent.homeoffice.gov.uk\)](https://www.prevent.homeoffice.gov.uk)

Always Consult responsibilities

The statutory guidance on the Prevent Duty (2015) makes clear that any visiting speakers invited into Schools or Colleges are suitable and appropriately supervised. Whilst Always Consult does not work with individuals 0-19 years of age we are committed to following this principal. Therefore, Always Consult will ensure that no visiting speakers undermine the fundamental British values. Research into speakers will include:

- The topic of the event
- The speakers reputation
- Status of the speaker by carrying our checks on internet search engines
- Whether there is consideration for potential speakers to use language intended to stir up hatred and incite violence.

Always Consult will

- Train and support our staff to identify learners who may be vulnerable
- Train our staff to understand what steps should be taken once a risk has been identified
- Create awareness of the Counter-Terrorism and Security within our training.
- Following our safeguarding policy, staff will be alert to any changes in learner's behaviour which could show signs that they may be in need of help or protection
- Engage with the Prevent Co-ordinators when necessary [Regional further education \(FE\) and higher education \(HE\) Prevent co-ordinators - GOV.UK \(www.gov.uk\)](#)
- Undertake a risk assessment annually to assess where and how learners and staff may be at risk of being drawn into terrorism.

Appendix C

Types of abuse

Staff should be alert to indicators of abuse and neglect. The below table gives an overview of signs and vulnerabilities, this list is not exhaustive and further signs and symptoms should be considered. For further information please refer to Keeping Children Safe [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/keeping-children-safe-in-education).

Types of Abuse

Type	Definition	Possible indicators
Physical abuse	Physical abuse: a form of abuse which 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.	Wearing long sleeved clothes/Pain / Cowering
Sexual abuse:	Sexual abuse involves forcing or enticing a child or young person or any person to take part in sexual activities, whether the person is aware of what is happening, could also be indecent exposure or sexual harassment.	Spending a long time in the bathroom. Discomfort in sitting down. Inappropriate behaviour.
Emotional/ Psychological abuse	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.	Withdrawn. Depression. Lack of confidence Socially awkward. Easily manipulated.
Financial abuse	Tactic used by abusers to limit and restrict their victim's access to their finances. For example, a young adult having their benefits taken away from them.	Change in appearance. Having expensive gadgets. Having no money. Not eating properly.

<p>Sexual violence and sexual harassment between children</p>	<p>Can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children</p>	<p>sexual comments, sexual remarks about clothes and appearance and calling someone sexualised names. Sexual “jokes” or taunting. physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes.</p>
<p>Children missing in education, while this affects 14–16-year-olds in compulsory education, the recent legislation requiring all children to stay in some form of education or training till age 18, means that we should investigate any learners that go missing without trace with this age range</p>	<p>Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life</p>	<p>Not showing up for visits with no explanation, not contactable, and neither lifetime nor employer can get hold of them or knows where they have gone</p>

<p>Neglect by others</p>	<p>Neglect is the persistent failure to meet a person’s basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger.</p>	<p>Withdrawn. Weight loss. Fear of going home. Improper hygiene Confusion. Inappropriate clothing</p>
<p>Self-neglect</p>	<p>Failure of an adult to take care of themselves. This could be a result of poor health, depression, cognitive problems or being physically unable to care for themselves. In this situation, family and carers would be expected to pick up on these signs and give or apply for appropriate care.</p>	<p>Poor diet and nutrition. Poor personal hygiene. Not taking prescribed medication. Substance misuse. Does not always encompass all aspects of life.</p>
<p>Discriminatory abuse</p>	<p>Discriminatory abuse involves someone being picked out deliberately for unfair treatment because of a protected characteristic. For example, a vulnerable adult is picked on by an employer because of their disability.</p>	<p>Fearful of certain people. Avoiding certain situations. Being asked to do more work than they should.</p>
<p>Organisational abuse</p>	<p>Neglect and poor care practice within an institution. or poor professional practice because of the structure, policies, processes and practices within an organisation. It is also related to gang culture</p>	<p>Setting Activity defined by a regime / task orientated. Being dismissive of complaints. Learner may need to leave at certain times. Ask permission to do everything. Appear brainwashed.</p>

Exploitation	It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child, young person or adult (including those with care and support needs) into: into any activity that results in financial or other advantage for the perpetrator or facilitator	Types of exploitation can include; Financial, Sexual, Criminal, Domestic Servitude, Forced Labour, Removal of Organs, Slavery.
Bullying (Inc. Cyberbullying)	Behaviour by group or individual repeated over time that intentionally hurts another individual or group either physically or emotionally (can be face to face, over text, social media exchanges)	Withdrawn/ nervous. Signs of physical and emotional abuse. Constant use of or fear of internet usage
Domestic abuse	Incident of pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who have been intimate partners or family members, can also be honour based	Signs of physical or emotional abuse Show signs of being controlled. Withdrawn. Anxious around others. Low self esteem
Drugs	Alcohol, tobacco, illegal drugs, medicines of psychoactive substances	Smelling of alcohol. Regular hangover symptoms. Inability to concentrate. Lateness. Change in commitment levels
Fabricated or induced illness	Making up signs and symptoms of an illness, falsifying medical records or inducing an illness to someone by any means	Child could pretend ill, think ill, and talk about persons taking them to Drs or hospital. Parents could talk about child consistent illness.
Faith abuse	Child abuse related to faith or belief, include concepts of witchcraft and spirit possession, rituals and sacrificial murders	Talking about beliefs and faith related activities engaged or family engaged with
Forced marriage	One or both spouses do not or cannot due to vulnerabilities, consent to marriage and duress is involved	Travel abroad. Recently Talking about getting married/ meeting men through family connections.

		Upholding religious duties.
Breast Ironing	The pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education rather than be forced into early marriage	Unusual behaviour after an absence from school or college including depression, anxiety, aggression, withdrawn etc. Reluctance in undergoing normal medical examinations. Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear
Gangs and youth violence	Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending	May have expensive items. Change in behaviour. Bruises/ Cuts. Social activities. Change to Gang tattoos. Carrying weapons.
Private fostering	Fostering arrangement without consent of Local Authority	Moving to different homes regularly. Not discussing family life. Abandonment characteristics
Female genital mutilation (FGM)	Partial or total removal of female external genitalia or injury to another part of the female genitalia for non - medical reason	Spending a long time in the toilet. Uncomfortable sitting down. Long trips away from home.
Gender based violence	Violence (either physical or sexual) towards women/ men	Withdrawn, nervous, Physical signs of abuse.

Radicalisation	Process by which a person comes to support/ partake in terrorism and extremism (also includes – political/ animal rights and ecological extremist). Extremism is ideology that is far outside the acceptable mainstream attitudes of society. – include opposition to British Values.	Long trips away from home. Talking about being wronged by a state or political system/ changing to a better life. Strong views about changing life. Talk of harming others in plight for cause.
Sexting	Exchange of self-generated sexually explicit images through mobile picture messages	Withdrawn. Boasting. Hiding mobile phones
Teenage relationship abuse	Abuse in a relationship – either physical, sexual, emotional, or financial	Withdrawn. Constantly responding to messages/ calls. Detect a control aspect. Physical signs of abuse
Trafficking and Modern Slavery	Encompasses 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.	Talking about travelling abroad. Talking about someone else having control over them. Moving homes regularly. Avoid eye contact and appear frightened. No identification documents. Physical or emotional abuse.
Mental health	Absence of psychological wellbeing and effective physical or psychological functioning	Becoming more withdrawn. Changes in behaviour or personal appearance, less punctual than normal, less interest

Appendix D

Online Safety

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

What is cyberbullying?

- Cyberbullying involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops, and PCs.
- Social media platforms such as Facebook, Instagram, Twitter, and WhatsApp are used by cyberbullies to put out their communications.

Who is most at risk?

- Children and vulnerable adults using social media unsupervised.
- Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse.

Definitions

Flaming	Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
Denigration	Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
Exclusion	Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.

Outing	Sharing secrets about someone online including private information, pictures, and videos.
Impersonation	Tricking someone into revealing personal. Information then sharing it with others.
Harassment	Repeatedly sending malicious messages to someone online.
Cyberstalking	Continuously harassing and denigration including threats of physical harm.
Up skirting	This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm;

Contacts

Designated safeguarding Lead (DSL) - Helen Birchall

Helen@alwaysconsult.com Tel: 07702 803487

Deputy Designated safeguarding Lead (DDSL) Nasreen Latif

Nasreen.latif@alwaysconsult.com Tel: 07961 603844

NSPCC Helpline

A helpline was launched by the NSPCC on 1st April 2021 to support potential victims of sexual harassment and abuse. **NSPCC helpline number is 0800 136 663.**

This dedicated helpline will offer support to:

- all children and young people making current and non-recent disclosures of abuse
- any children or young people who want to talk about being involved or witnessing any incidents
- any adults who have experienced non-recent abuse
- parents and carers who have any concerns about their own or other children
- professionals who work in schools and need support in this or related issues

Further contacts

A separate regional contact list is kept detailing safeguarding contact. Staff can access this in the policy and procedures section on Sharepoint.

Appendix F

**▲ Action Guideline for Always Consult Staff/Associate |
Receiving a Disclosure/Suspicion**

