

# Safeguarding Procedure

Expanse Learning College

November 2022

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Version 2

Review Date: Sep 2023

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## Contents

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1.	GENERAL PRINCIPLES OF SAFEGUARDING	3
2.	SAFEGUARDING CHILDREN	3
3.	SAFEGUARDING ADULTS	3
4.	THE AIMS OF ADULT SAFEGUARDING ARE TO:	3
5.	THE COLLEGE STAFF WITH SPECIFIC SAFEGUARDING DUTIES	3
6.	HOW TO RECOGNISE ABUSE OF CHILDREN OR ADULTS AT RISK	4
7.	SPECIFIC SAFEGUARDING ISSUES AND RECOGNISED FORMS OF ABUSE	4
8.	THE 5 TIER SYSTEM	4
9.	TYPES OF ABUSE	5
10.	SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN IN SCHOOLS AND COLLEGES	7
11.	INCIDENTS BETWEEN SERVICE USERS (CHILD-ON-CHILD ABUSE) – SAFEGUARDING OR BEHAVIOUR?	8
12.	HOW TO RESPOND TO A DISCLOSURE, ALLEGATION OR CONCERN FOR A COLLEGE STUDENT	8
13.	SHARING INFORMATION WITH OTHER AGENCIES	10
14.	RAISING ALERTS OF ABUSE OR CONCERNS OF ABUSE.	10
15.	INFORMING PARENTS / CARERS OF STUDENTS	11
16.	PREVENTION OF ABUSE	11
17.	SUPPORTING STUDENTS AND STAFF FOLLOWING A DISCLOSURE OR ALLEGATION	11
18.	PROFESSIONAL DISAGREEMENT	11
19.	CHILDREN IN CARE (CIC)	11
20.	CHILDREN MISSING FROM EDUCATION	12
21.	EARLY HELP	12
22.	EQUALITY AND DIVERSITY/LGBT	12
23.	RESPONDING TO USE OF DRONES BY MEMBERS OF THE PUBLIC	12
24.	NOTIFICATION TO FUNDING AUTHORITIES	13
25.	REFERRAL TO THE DISCLOSURE AND BARRING SERVICE (DBS)	13
26.	MAINTAINING RECORDS	14
27.	TRAINING	14
28.	COLLEGE REVIEW OF SAFEGUARDING	15
29.	THE EXPANSE GROUP STRATEGIC LEADERS MEETING (SAFEGUARDING STRATEGY)	15
30.	THE SAFEGUARDING OPERATIONAL GROUP	15
31.	CONTACT NUMBERS AND FURTHER INFORMATION	15
32.	WHERE A CHILD OR ADULT AT RISK IS IN SERIOUS DANGER CONTACT THE EMERGENCY SERVICES VIA 999 IMMEDIATELY TO SEEK URGENT ASSISTANCE.	16
33.	PROCEDURE FOR SENIOR MANAGER / GOVERNOR WITH SAFEGUARDING RESPONSIBILITIES IN THE CASE OF AN ALLEGATION OR CONCERN ABOUT THE BEHAVIOUR OF A MEMBER OF STAFF (INCLUDING AGENCY STAFF, GOVERNOR, CONTRACTOR OR VOLUNTEER)	17
34.	DISCIPLINARY PROCEDURE	18

## 1. General Principles of Safeguarding

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- It is the responsibility of everyone within the college to protect children and adults at risk of abuse or neglect.
- **Staff should not assume that someone else will take action.**
- Staff must always act in the interest of the child or adult at risk.
- Staff should ensure they read Part 1 and Annex A of 'Keeping Children Safe in Education' (2022)
- The General Data Protection Regulation (GDPR) and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping people safe.
- Information can be shared without consent to keep an individual at risk safe from neglect or physical, emotional, or mental harm, or if it is protecting their physical, mental, or emotional wellbeing.
- Where possible, consent should be sought from the individual before information is shared.

## 2. Safeguarding children

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**Child:** A person who is under 18 years of age.

**Safeguarding:** Safeguarding and promoting the welfare of children involves

- protecting children from maltreatment.
- preventing impairment of children's health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- taking action to enable all children to have the best outcomes. *Department for Education (Working Together to Safeguard Children 2018)*

## 3. Safeguarding adults

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**Adult:** A person who is aged 18 years or over

**Safeguarding:** Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect.

Safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of these needs) and
- is experiencing, or at risk of, abuse or neglect and
- as a result of these care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect *Department of Health (Care Act 2014 Care and Support Statutory Guidance)*

## 4. The aims of adult safeguarding are to:

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- stop abuse or neglect wherever possible.
- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs; safeguard adults in a way that supports them in making choices and having control about how they want to live; promote an approach that concentrates on improving life for the adults concerned; provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult; and address what has caused the abuse or neglect.
- In preventing or minimising the risk or experience of abuse or neglect of an adult, staff must promote the adult's wellbeing including where appropriate having regard to their views, wishes, feelings and beliefs in deciding on any action.

## 5. The college staff with specific safeguarding duties

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The college staff with responsibility for safeguarding and child protection:

- **Lorraine Woosey:** Designated Safeguarding Lead (DSL)
- **Julianne Prescott:** Designated Safeguarding Officer (DSO) – Wigan College
- **Scott Gray:** Designated Safeguarding Officer (DSO) – Leigh College
- **Karl Wane:** Designated Safeguarding Officer (DSO) & Deputy Safeguarding Lead
- **Scott Roberts:** Designated Safeguarding Officer (DSO) – Peripatetic

The college staff with responsibility for Allegations Management:

- **Karl Wane:** Director of College
- **Scott Roberts:** Head of Shared Services

Governor with responsibility for Allegations Management:

- **Martin Budden:** Chair of Governors
- **Christine Galligan:** Safeguarding Lead

## 6. How to recognise abuse of children or adults at risk

To recognise signs and symptoms of abuse staff must be open to the possibility of non-accidental injury or other forms of abuse and share any concerns with the college safeguarding staff or a senior manager.

Staff should think, 'it could happen to a college student' and 'it could happen here'

**Staff should not assume that someone else will take action**

## 7. Specific Safeguarding Issues and Recognised Forms of Abuse

Abuse comes in many forms. The following is not an exclusive list and the signs and symptoms do not necessarily indicate abuse.

## 8. The 5 Tier System

The process allows organisations to record and monitor low level safeguarding incidents, to stop them from escalating to a safeguarding enquiry. The system works on 5 tiers, as below:

- **Tier 1** Managed within own organisation. Monitored by relevant Quality Performance Officer (QPO) if your service has one assigned.
- **Tier 2** Referral passed to LA and overseen by relevant QPO. Ensure duplicate copy is kept on site.
- **Tier 3** Alert raised to the Local Authority (LA) Initial Assessment Team (Duty). Enquiries then made in line with Wigan's multi agency safeguarding hub (MASH)
- **Tier 4** Alert raised to LA Initial Assessment Team (Duty). Potential crime and investigation by police and safeguarding procedures.
- **Tier 5** Indicated potential for safeguarding adult review (SAR). Safeguarding Board critical case meeting procedure, record kept in organisation. agency policy and procedures.

The model is embedded across the borough. ***Please refer to Appendix 1 for the Pastoral and Safeguarding Workflow Process.***

**Immediate action may be necessary at any stage in involvement with young people and families.**

**IN ALL CASES IT IS VITAL TO TAKE WHATEVER ACTION IS NEEDED TO SAFEGUARD THE PERSON**

If emergency medical attention is required, this can be secured by calling an ambulance (dial 999) or taking the young person to the nearest Accident and Emergency Department. Parents, carers, and any relevant professional will be contacted to update all the concern.

If required a '**Student Information Sheet**' can be printed directly from Databridge MIS, this is to be handed to the Emergency services allowing communication and update of all conditions etc. A copy of the Next of Kin details and contacts and any prescribed medication is to be shared with the emergency services.

If the person is in **immediate danger** the Police should be contacted (dial 999). Consultation with the Police at the earliest possible point is essential when alleged abuse or neglect may be a criminal offence. If the police establish a criminal act has been committed, the police investigation will take priority over all other on-going investigations.

Incidents of abuse may be one-off or multiple and affect one person or more.

## 9. Types of abuse

Type of Abuse	Description	Useful Links
<b>Physical Abuse</b>	<i>Physical abuse is deliberately hurting a person causing injuries such as bruises, broken bones, burns or cuts</i>	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/physical-abuse/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/physical-abuse/</a> <a href="https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx">https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx</a>
<b>Sexual Abuse</b>	<i>Sexual abuse is when a person is forced or persuaded to take part in sexual activities</i>	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-abuse/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-abuse/</a> <a href="https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx">https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx</a>
<b>Serious Violence</b>	Serious violence is when a person is at risk from or involved with serious violent crime	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-abuse/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-abuse/</a> <a href="https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx">https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx</a>
<b>Child Sexual Exploitation (CSE)</b>	Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/</a> <a href="https://www.wiganlscb.com/Professionals/Keeping-children-safe/Child-sexual-exploitation.aspx">https://www.wiganlscb.com/Professionals/Keeping-children-safe/Child-sexual-exploitation.aspx</a>
<b>Child Criminal Exploitation (CCE) -County Lines</b>	<i>Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs</i>	<a href="https://learning.nspcc.org.uk/child-abuse-and-neglect/county-lines">https://learning.nspcc.org.uk/child-abuse-and-neglect/county-lines</a>
<b>Emotional or Psychological Abuse</b>	<i>Emotional abuse is the ongoing emotional maltreatment of a person. It's sometimes called psychological abuse and can seriously damage a person's emotional health and development</i>	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/emotional-abuse/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/emotional-abuse/</a> <a href="https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx">https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx</a>
<b>Financial or Material Abuse</b>	<i>Financial or Material abuse is limiting access to money or other resources, using a person's money for their own gain or by forcing all financial responsibility onto their victim while limiting their ability to provide this</i>	<a href="http://www.lwa.org.uk/understanding-abuse/abusive-relationships/financial-abuse.htm">http://www.lwa.org.uk/understanding-abuse/abusive-relationships/financial-abuse.htm</a> <a href="https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx">https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx</a>
<b>Neglect or Acts of Omission</b>	<i>Neglect and acts of omission include ignoring medical, emotional or physical care needs. Failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating</i>	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/neglect/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/neglect/</a> <a href="https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx">https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx</a>
<b>Discrimination</b>	<i>Discrimination means treating a person unfairly because of who they are or because they possess certain characteristics i.e. a disability.</i>	<a href="https://www.wigan.gov.uk/LINC2/Survival-Guide/Education-and-work/Bullying.aspx">https://www.wigan.gov.uk/LINC2/Survival-Guide/Education-and-work/Bullying.aspx</a>
<b>Cyber Bullying</b>	<i>The use of electronic communication to bully a person, typically by sending messages of an intimidating or threatening nature</i>	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/bullying-and-cyberbullying/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/bullying-and-cyberbullying/</a> <a href="https://www.bullying.co.uk/cyberbullying/effects-of-cyberbullying/">https://www.bullying.co.uk/cyberbullying/effects-of-cyberbullying/</a>
<b>Domestic Abuse</b>	<i>Domestic abuse as an incident or pattern of incidents of controlling, coercive, threatening, degrading and / or violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. It is very common</i>	<a href="https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/">https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/</a> <a href="https://www.wigan.gov.uk/Resident/Crime-Emergencies/Domestic-abuse/Index.aspx">https://www.wigan.gov.uk/Resident/Crime-Emergencies/Domestic-abuse/Index.aspx</a>
<b>Honour Based Violence</b>	<i>Honour based violence (HBV) is a form of domestic abuse which is perpetrated in the name of so called 'honour'. The honour code which it refers to is set at the discretion of male relatives and women who do not abide by the 'rules' are then punished for bringing shame on the family.</i>	<a href="https://www.refuge.org.uk/our-work/forms-of-violence-and-abuse/honour-based-violence/">https://www.refuge.org.uk/our-work/forms-of-violence-and-abuse/honour-based-violence/</a>
<b>Female Genital Mutilation (FGM)</b>	<i>Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.</i>	<a href="https://www.nhs.uk/conditions/female-genital-mutilation-fgm/">https://www.nhs.uk/conditions/female-genital-mutilation-fgm/</a>

<b>Forced Marriage</b>	<i>A forced marriage is where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used to force them to do so. It is recognised in the UK as a form of domestic/child abuse and a serious abuse of human rights</i>	<a href="https://www.childline.org.uk/info-advice/bullying- abuse-safety/crime-law/forced-marriage/">https://www.childline.org.uk/info-advice/bullying- abuse-safety/crime-law/forced-marriage/</a>
<b>Self-Neglect</b>	<i>Self-neglect is when a person, by choice or lack of awareness or ability, disregards their health. It can also include when a person refuse needed care or help with daily activities.</i>	<a href="https://www.manchestersafeguardingpartnership.co.uk/resource/self-neglect-advice-for-all/">https://www.manchestersafeguardingpartnership.co.uk/resource/self-neglect-advice-for-all/</a>
<b>Organisational Abuse</b>	<i>Organisational Abuse includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment.</i>	<a href="https://www.wigansafeguardingadults.org/Docs/Guidance/Explaining-Organisational-Abuse-Factsheet.pdf">https://www.wigansafeguardingadults.org/Docs/Guidance/Explaining-Organisational-Abuse-Factsheet.pdf</a>
<b>Radicalisation</b>	<i>The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.</i>	<a href="https://www.nspcc.org.uk/what-you-can-do/report- abuse/dedicated-helplines/protecting-children-from- radicalisation/">https://www.nspcc.org.uk/what-you-can-do/report- abuse/dedicated-helplines/protecting-children-from- radicalisation/</a> <a href="https://www.wigan.gov.uk/Docs/PDF/WSCB/PVE-Policy.pdf">https://www.wigan.gov.uk/Docs/PDF/WSCB/PVE-Policy.pdf</a> <a href="https://www.wigansafeguardingadults.org/Docs/Guidance/Prevent-Duty-and-Channel-Factsheet.pdf">https://www.wigansafeguardingadults.org/Docs/Guidance/Prevent-Duty-and-Channel-Factsheet.pdf</a>
<b>Sexual Violence and Sexual Harassment</b>	<p><i>Sexual violence is any unwanted sexual act or activity. There are many kinds of sexual violence, including but not restricted to: rape, sexual assault, child sexual abuse, sexual harassment, rape within marriage / relationships, forced marriage, so-called honour-based violence, female genital mutilation, trafficking, sexual exploitation, and ritual abuse.</i></p> <p><i>Sexual harassment is any unwanted behaviour of a sexual nature that you find offensive, or which makes you feel distressed, intimidated or humiliated.</i></p>	<a href="https://www.nspcc.org.uk/what-we-do/news- opinion/sexual-violence-harassment-children- schools-colleges-government-guidance/">https://www.nspcc.org.uk/what-we-do/news- opinion/sexual-violence-harassment-children- schools-colleges-government-guidance/</a> <a href="https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx">https://www.wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx</a>
<b>Voyeurism</b>	<p><b>'Upskirting'</b> has been included in the list of examples of forms of peer-on-peer abuse with its definition as follows "[Upskirting] 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".</p> <p>All staff are made aware of the changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'up skirting'. The <u>Criminal Prosecution Service (CPS)</u> defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders."</p> <p>Voyeurism has been added to the behaviour categories within DatabridgeMIS and can be monitored in monthly reports</p>	<a href="https://www.cps.gov.uk/legal-guidance/voyeurism">https://www.cps.gov.uk/legal-guidance/voyeurism</a>
<b>Sharing of nudes and semi-nudes</b>	<p><b>How to respond to an incident</b></p> <p>All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and will be managed in line with this policy</p> <p><b>What do we mean by sharing nudes and semi-nudes?</b></p> <p>UKCIS (2020) defines the sharing of nudes and semi-nudes as:</p>	<a href="https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people">https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people</a>

	<p><b><i>“The sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums”</i></b></p> <p>It could also involve sharing between devices via services like Apple’s Airdrop which works offline. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’. The motivations for taking and sharing images, videos and live streams are not always sexually or criminally motivated. This advice does not apply to adults sharing nudes or semi-nudes of under 18-year-olds. <i>(This is a form of child sexual abuse and must be referred to the police as a matter of urgency).</i></p>	
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## 10. Sexual violence and sexual harassment between children in schools and colleges

### Context

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys” and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### What is Sexual violence and sexual harassment?

**Sexual violence:** It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. School should be aware that sexual assault covers a wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom/breast/genitalia without consent can still constitute sexual assault.
- **What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. **A child under 13 can never consent to any sexual activity.**

## 11. Incidents between service users (Child-on-Child Abuse) – Safeguarding or behaviour?

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In line with Keeping Children Safe in Education (2022), the college have a duty to protect students against child-on-child abuse.

There are many forms of abuse that can occur between peers, such as physical abuse, sexually harmful behaviour/sexual abuse, bullying, cyber bullying, sexting, up skirting, initiation/hazing, sexual violence and sexual harassment and prejudiced behaviour.

All concerns around peer-on-peer abuse must be reported to the DSL via DatabridgeMIS. A number of factors will be taken into consideration prior to appropriate next steps being formulated. Particular attention will be paid to how the college are managing specific situations and whether there is a requirement for increased student support or a change to support plans to reduce or stop certain behaviours.

Prior to requesting the support of outside agencies, consideration will be given to whether the student is deemed at 'risk of significant harm'. In the case of allegations of sexual abuse and sexting (involving students under the age of 18 years), support from the Police will be sought immediately and reported to the relevant Safeguarding Team.

The thresholds for physical abuse would be either persistent intentional harm, even if not causing significant or long-lasting injury to the student and which the Organisation is unable to manage successfully, and/or intentionally leaving a mark or breaking the skin of another student. Persistent bullying of students that cannot be managed successfully internally and where there is a significant impact on the emotional wellbeing and mental health of the student will also be reported to relevant agencies.

The requirements for each incident will be carefully considered by the DSL and relevant staff. The outcome may differ depending on the circumstances and the needs of each student.

Persistent unintentional physical harm should continue to be reported to the DSL via DatabridgeMIS and while these will be handled internally, there will be a clear emphasis on how staff can support in reducing these incidences.

## 12. How to respond to a disclosure, allegation or concern for a college student

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**Disclosure:** A student states they have been or are being abused by another.

**Allegation:** A member of staff (including agency staff), governor, contractor or volunteer working with children or vulnerable adults is accused of committing an abuse.

It is the responsibility of staff including volunteers to report concerns **not** to decide whether it is or is not abuse.

The need to protect the child or adult at risk overrides any concerns about "false allegations"; even if you think a disclosure or allegation may be untrue you must still report it.

Abuse is usually discovered in three ways:

- The student makes a disclosure or allegation to someone that abuse has or may have occurred.
- Someone sees the abuse occurs
- Someone identifies signs and symptoms that may indicate abuse.

These principles are to be followed in all cases of disclosure or alleged abuse:

**If you receive a disclosure or an allegation is made to you the following steps should be taken:**

### Respond

- Do not promise to keep it a secret.
- Do not react – try not to show shock, disgust or disbelief.
- Listen patiently and closely.
- Only seek to clarify essentials – what, where, when, who
- Do not question the alleged victim about the incident – do not ask leading questions (any further questioning by staff could affect the validity of any statement collected by police at a later date).



- Do not make promises about the future or statements that are incorrect.

#### **Assist**

- If necessary, ensure the person receives medical treatment.
- Seek to ensure the person's safety.
- Always encourage and allow the individual to take any next steps on their own.
- Provide appropriate support to the victim's needs and agree a course of action.

#### **Preserve**

- Do not confront the alleged perpetrator.
- If the abuse happened recently do not allow any access to any place where the abuse may have occurred.
- Look after any items given to you – place them in a clean plastic bag.

#### **Record**

- Record what you see and what you are told as soon as possible or during the disclosure if appropriate – include the person's wishes about what action to take.
- Use the alleged victim's own words.
- Cross out mistakes do not use correction fluid.
- All notes should be timed, dated and signed, with name printed alongside the signature, by the member of staff making the notes.

#### **Report**

##### **In the case of a disclosure:**

- Report to the DSL **within 2hrs**.
- In the absence of the DSL report the matter to the Director of College within 2hrs **if** you believe the college may need to take some action.
- If you believe some action may be needed and the DSL cannot be contacted report to **any** other senior manager.
- Complete a Safeguarding event on DatabridgeMIS.
- The form must be submitted within 24 hours and will be picked up by the DSL.
- Pass any notes or other record made of the disclosure to the DSL.

##### **In the case of an allegation (a complaint against a member of staff): Report within 2 hours to:**

- Lorraine Woosey: Designated Safeguarding Lead (DSL)
- Julieann Prescott: Designated Safeguarding Officer (DSO)
- Scott Gray: Designated Safeguarding Officer (DSO)
- Karl Wane: Designated Safeguarding Officer (DSO) & Deputy Safeguarding Lead
- Scott Roberts: Head of shared Services
- In the absence of any of the above, report the matter to the College manager.
- If none of the above can be contacted, **report to any other senior manager**.
- **Where the allegation is against** the Designated Safeguarding Lead, Chief Operations Officer, Safeguarding Practitioner or the on-call manager and another of the above is not available, **report to any other senior manager**.

##### **If you witness abuse:**

- Seek to ensure the student's safety, without endangering yourself.
- If necessary, seek medical assistance for the person.
- Report to the DSL, DSO or other senior manager immediately.
- If necessary, contact the Police – where someone is at severe risk of harm dial 999.
- Seek to ensure the victim has no contact with the alleged abuser. It may be necessary to inform other staff on duty that there has been an incident, but information passed to them must be kept to a minimum.

##### **If you have concern that abuse is occurring or has or may have occurred:**

- Discuss concerns with the Designated Safeguarding Lead as soon as possible, or in their absence with the Organisation contact the Director of College **if** you believe they may need to take some action.

#### **The victim's wishes.**

When considering what action to take and what provision should be made to protect the student following a disclosure or a concern being raised, their wishes and feelings should be sought and considered.

Staff must not promise confidentiality and must always act in the interests of the victim.

**Note:** In the case of an allegation, the college must take action regardless of the victim's wishes.

### **Confidentiality**

The college will work on a need-to-know basis. However, depending on the nature of the abuse and the action that may need to be taken the following people may be involved:

- The Designated Safeguarding Lead or DSO
- The Head of Shared Services
- The Local Authority Safeguarding Team or Local Authority Designated Officer
- The victim's social worker or Social Services teams
- The Police

Depending on the circumstances other key staff may be informed; these could include:

- Nursing team / GP
- Student's Key Worker
- Other members of the Senior Management team
- Counselling / psychology staff

Where a member of staff is the alleged abuser:

- The Human Resources Department
- The member of staff's representative (usually from the union)

All the college staff are bound by the organisations policy on confidentiality; however, the needs and wellbeing of the person will take precedence over issues of confidentiality. On this basis, the college reserves the right in certain circumstances to inform outside agencies even when permission has not been given by the student or their parent or guardian.

### **13. Sharing information with other agencies**

The right to confidentiality is not absolute. Sharing relevant information with the right people at the right time is vital to good safeguarding practice.

The General Data Protection Regulation (GDPR) and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping people safe.

- It is inappropriate to give assurances of absolute confidentiality in cases where there is a concern regarding abuse and neglect, particularly when there may be others at risk.
- Confidentiality must not be confused with secrecy.
- Sharing information is necessary to protect children, young people and adults at risk of abuse or neglect.
- Early sharing of information is key to providing an effective response.
- No professional should assume that someone else will pass on information.
- Informed consent must be obtained, however if this is not possible or will put the person or others at risk, it may be necessary to override this.

### **14. Raising alerts of abuse or concerns of abuse.**

When a disclosure or allegation of abuse or cause for concern is reported within the college, the Designated Safeguarding Lead will:

- Consider if an alert should be made to the appropriate Safeguarding Team or relevant Police Force.
- Be directed by and work with the appropriate Local Authority Safeguarding Team or relevant Police Force to ensure an open and thorough investigation of the disclosure or allegation.

The 'appropriate Local Authority Safeguarding Team' or 'relevant Police Force' is the service responsible for the geographical area in which the alleged or suspected abuse occurred.

**Note:** it is mandatory to report any suspected abuse involving a child or young person under the age of 18 years.

Students may on occasions find themselves in situations that they are not comfortable with or may later regret. The result of these encounters, which may be physical, sexual or emotional, may not technically be termed as abuse or appear to cause significant harm. When incidents of this nature arise, the Designated Safeguarding Lead will inform the Local Authority Safeguarding Team and gather evidence, if necessary, in order to make a judgement about the most appropriate action to take.

### **15. Informing Parents / Carers of Students**

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The college will work with parents / carers and guardians whenever possible and will inform them of any investigations regarding their son or daughter unless:

- The parent / carer, guardian or close family member is suspected of being involved with the abuse.
- The student is age 18 years or over and specifically asks the college not to inform his / her parent / carer or guardian – in these circumstances the college will work actively with the person to gain their consent.
- The college representative has reasonable grounds to suspect that talking to the parent / carer or guardian may cause harm to himself or herself and / or the student.

### **16. Prevention of Abuse**

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The college firmly believes in prevention and early identification of abuse or its precedents. To this end the college promote a safe and open culture.

The college uses the following systems to support the prevention of abuse:

- Respectful and non-abusive cultures
- Systems and structures within the workplace
- Person Centred Care plans, needs and risk assessments
- Inducting new staff
- Team meetings
- Advocacy and the Empowerment of students
- Supervision and ongoing Training of staff
- Handovers and Reviews

### **17. Supporting students and staff following a disclosure or allegation**

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The college can provide support to students who make a disclosure or allegation and staff who assist students when they do so to cope with the psychological effects.

All allegations will be investigated and where a member of staff is the subject of an allegation information will be shared with them when appropriate. At this time, they will be offered support through the Human Resources Team and Occupational Health.

### **18. Professional Disagreement**

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If you have reported a concern, the DSL should keep you informed as far as possible about developments and the outcome of the investigation of your concern.

If you do not consider the concern has been satisfactorily investigated or you disagree with the conclusion of the investigation, in the first instance speak with the DSL. If after this discussion you remain unsatisfied, speak with the Director or college manager who will take the matter forward on your behalf.

### **19. Children in Care (CIC)**

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The relevant college Manager is responsible for the college Students who are Children in Care and will ensure; the educational achievement of Children in Care is promoted; appropriate staff have the information they need about a Child in Care's legal status and contact and care arrangements. Details of the Child in Care's Social Worker will be available on DatabridgeMIS. Where possible, the DSL will hold confidential safeguarding information regarding the Child in Care.

## **20. Children Missing from Education**

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All staff should be aware that children and young people going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and the help prevent the risks of a child or young person going missing in future.

Where reasonably possible, the relevant college manager should hold more than one emergency contact number for each student. This goes beyond the legal minimum but is good practice.

The relevant college Manager is responsible for monitoring the attendance of the college students to identify and respond to a concern that a child is missing from education.

## **21. Early Help**

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For children and young people, early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, including teenage years.

Any child or young person may benefit from Early Help, but all staff should be particularly alert to the potential need for Early Help for a child who:

- Has special Educational Needs-whether or not they have a statutory education, health, and care plan (EHCP)
- Is a young carer.
- Is showing signs of being drawn in to antisocial or criminal behaviour, including
- gang involvement and association with organised crime groups. o Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or exploitation.

Where a concern is raised for a child, the college will follow the guidance to inter-agency working to safeguard and promote the welfare of children contained in Working Together to Safeguard Children (2018)

Where a member of staff working with students from schools or other colleges or with other students is made aware of an existing safeguarding issue, they should inform the DSL or a DSO.

## **22. Equality and Diversity/LGBT**

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The college understands that promoting equality and diversity and tackling discrimination is essential in safeguarding the students. The college has separate policies and procedures in place to address issues such as transgender. The college also has an anti-bullying policy that covers harassment and discrimination. For more information, please refer to afore mentioned policies.

See KCSIE (2022)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, students who are LGBT can be targeted by other students. In some cases, someone who is perceived by others to be LGBT (whether or not) can be just as vulnerable as someone who identifies as LGBT.

Risks can be compounded where students who are LGBT lack a trusted adult with whom they can be open, we endeavour to reduce the additional barriers faced by providing a safe space for them to speak to the Pastoral staff or any trusted adult.

## **23. Responding to use of drones by members of the public**

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Most drones will be equipped with video and still cameras which can obtain high-quality images from several kilometres away. Members of the public (people who are not associated with Expanse Learning's community or otherwise engaged by Expanse Learning) must not fly drones within or above Expanse Learnings grounds or photograph our buildings, grounds or student without explicit prior approval from the Board of Directors.

Additionally, members of the public are not permitted to photograph or video students. This applies to members of the public using drones for recreational or commercial purposes.

Approval requests should provide details of the size of aircraft to be used, evidence of the required pilot licences and operator's certifications, flight plans, insurance coverage and evidence of CAA notification.

**Any concerns about unmanned aircraft being used in close proximity to our premises either from a safety or privacy perspective MUST be reported immediately to the local police on 101**

The Police often have greater resources, response times and powers of investigation than the CAA. To support this, the CAA has now agreed with the Police, in a signed Memorandum of Understanding that the Police will take the lead in dealing with unmanned aircraft misuse incidents, particularly at public events, that may contravene aviation safety legislation or other relevant criminal legislation.

The CAA's remit is limited to safety and does not include concerns over privacy or broadcast rights.

Privacy issues are covered by the Information Commissioners Office (ICO) and will not be dealt with by the CAA.

#### **24. Notification to Funding Authorities**

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The funding authority of a student subject to a safeguarding concern that involves another student of the college or a member of the college staff must be informed of the issue within 24hrs of it coming to the attention of the college.

The DSL will pass relevant details to the college's **Data & Compliance Manager** who will make the report to the funding authority.

#### **25. Referral to the Disclosure and Barring Service (DBS)**

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The Safeguarding Vulnerable Groups Act 2006 place a duty on employers of people working with children or vulnerable adults (adults at risk) to make a referral to the DBS when an employer has dismissed or removed a person from working with children or vulnerable adults (or would or may have if the person had not left or resigned etc.) even if the person's future employment was not in regulated activity, because the person has:

- Been cautioned or convicted for a relevant offence; or
- Engaged in relevant conduct in relation to children and/or vulnerable adults [i.e. an action or inaction (neglect) that has harmed a child or vulnerable adult or put them at risk of harm]; or
- Satisfied the Harm Test in relation to children and/or vulnerable adults. [i.e. there has been no relevant conduct (i.e. no action or inaction) but a risk of harm to a child or vulnerable adult still exists].

#### **Relevant offence:**

A relevant offence is a serious offence that will, subject to consideration of representations where permitted, automatically bar a person from working with children or vulnerable adults. Information about relevant offences can be found at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/157242/dbs-factsheet-05.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/157242/dbs-factsheet-05.pdf)

**Relevant conduct** is conduct (an action or inaction / neglect) that:

- Endangers a child / vulnerable adult or is likely to endanger a child / vulnerable adult. A person's conduct endangers a child / vulnerable adult if they:
  - Harm a child / vulnerable adult
  - Cause a child / vulnerable adult to be harmed.
  - Put a child / vulnerable adult at risk of harm.
  - Attempt to harm a child / vulnerable adult.
  - Incite another to harm a child / vulnerable adult.
  - If repeated, against or in relation to a child / vulnerable adult would endanger the child / vulnerable adult or be likely to endanger the child / vulnerable adult.
  - Involves sexual material relating to children (including possession of such material)
  - Involves sexually explicit images depicting violence against human beings (including possession of such images)
  - Is of a sexual nature involving a child / vulnerable adult.

**The harm test:**

A person satisfies the harm test if they may have:

- Behaved in a way that has harmed a child / vulnerable adult or may have harmed a child / vulnerable adult.
- Possibly committed a criminal offence against or related to a child / vulnerable adult.
- Behaved towards a child / vulnerable adult in a way that indicates he or she may pose a risk of harm to children or vulnerable adults.

**DBS Referral Procedure:**

- If the college is made aware an employee has been convicted of a relevant offence the DSL must be advised to consider a referral to the DBS as soon as possible, even if the person is not seeking employment in regulated activity.
- Before making other referrals to DBS, the college will:
  - Follow the safeguarding procedures set out above including informing the Police and / or making an alert to the appropriate LADO or Adult Safeguarding Service.
  - Undertake an investigation to establish if the allegation has foundation.
  - Where an allegation has foundation, gather evidence to support the allegation.

Review the evidence to decide if the criteria for making a referral to the DBS has been met. The DSL and Head of Shared Services will be responsible for conducting the review.

- Provide DBS with supporting evidence of the referral.
- As far as possible, complete the investigations even if the person has left the college employment.
- If additional relevant information becomes available after making a referral, provide this to the DBS.

The DSL will make the referral to DBS on behalf of the college.

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**26. Maintaining Records**

The DSL and Safeguarding Practitioners are responsible for maintaining records relating to safeguarding issues that are reported in the organisation.

The records will be kept in a secure location and confidentiality will be maintained.

To comply with the General Data Protection Regulation (GDPR) and Data Protection Act 2018 the records will be accurate, relevant and secure and there will be justification for holding the information. Information will be shared but only where appropriate and in compliance with the Act.

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**27. Training**

The college acknowledges the value of staff training in supporting a respectful and non- abusive culture and in the identification of abuse.

Everyone joining the college, in a paid or unpaid capacity, will undergo an induction which will involve an explanation of the Safeguarding Policy and the Code of Professional Practice (Code of Conduct); introduction to the DSL and DSO's and an explanation of Keeping Children Safe in Education (2022).

All the college staff will attend training during induction on the identification and prevention of abuse, action in case of a disclosure and reporting and recording (Foundation training) and in Safer Working Practice and Boundaries. In addition, all residential staff will undertake induction and foundation training in accordance with Skills for Care Standards.

All the college staff will receive refresher training bi-annually (Online e-safety is annually)

The will undertake Wigan Safeguarding Board Multi-Agency training for both Children and Adults every 2 years.

## **28. College Review of Safeguarding**

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### **Staff / Team Meetings**

Safeguarding will be a standing item on the agenda at all staff/team meetings.

The chair of the meeting will be responsible for ensuring that:

- If a safeguarding concern regarding a student is raised by a member of staff at the meeting a report of the concern is made to the DSL or DSO
- Any matters raised regarding safeguarding, such as risks that have been identified or suggested changes to safeguarding procedure are passed to the DSL

## **29. The Expanse Group Strategic Leaders Meeting (Safeguarding Strategy)**

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The Group will take an overview of the Organisation's safeguarding strategy as informed by the work of the Safeguarding Operational Group, changes in legislation and developments in safeguarding practice to ensure that the

Organisation meets its commitment and duty in relation to safeguarding.

The group meet once each term.

The Group is made up of the Chief Operations Officer, Board of Directors, Head of Shared Services, Head of SEND Strategic Development and where appropriate other senior members of staff from the organisation.

## **30. The Safeguarding Operational Group**

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The Safeguarding Operational Group is made up of relevant operational heads of department and is a forum to consider safeguarding requirements at an operational level, discuss relevant case studies to inform next steps, lessons learned and disseminate good practice and significant legislative information to teams. This group actively feeds into the Safeguarding Strategy Group.

This group meet regularly during the college case conference meetings that is made up of the Director of College, College Managers, DSL, DSO and relevant teaching staff where required.

## **31. Contact numbers and further information**

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### **Wigan Safeguarding Adult Board**

The board is a multi-agency forum for agreeing how the different services and professional groups will co-operate to safeguard adults at risk of abuse or neglect across the borough.

To improve the outcome of safeguarding, the board will monitor safeguarding processes and ensure suitable mechanisms are in place to identify abuse or inadequate care, to support adults at risk and to facilitate the planning and implementation of joint preventative strategies.

### **The Safeguarding Adults Board will help and support individual agencies in meeting their responsibilities**

The Safeguarding Adult Board core members (as prescribed by the Care Act 2014) are:

- Wigan Council
- Wigan Borough Clinical Commissioning Group
- Greater Manchester Police In addition key partners are: -
- North West Boroughs Partnership NHS Foundation Trust
- Bridgewater Community Healthcare NHS Trust
- Greater Manchester Probation Trust
- HM Coroner's Office
- NHS England
- The Care Quality Commission
- Healthwatch Wigan & Leigh
- Wrightington, Wigan & Leigh NHS Foundation Trust
- Greater Manchester Fire and Rescue Service All members and partner agencies accept responsibility for protecting vulnerable adults from abuse.

<b>Designated Senior Lead for Safeguarding</b> Name: Lorraine Woosey email: <a href="mailto:Lorraine.woosey@expansegroup.co.uk">Lorraine.woosey@expansegroup.co.uk</a> Tel: 01942 486866	<b>Designated Safeguarding Officer</b> Name: Karl Wane Email: <a href="mailto:karl.wane@expansegroup.co.uk">karl.wane@expansegroup.co.uk</a> Tel: 07885 205711
<b>Designated Safeguarding Officer (Deputy Senior Lead)</b> Name: Julie-Anne Prescott email: <a href="mailto:Julieanne.Prescott@expansegroup.co.uk">Julieanne.Prescott@expansegroup.co.uk</a> Tel: 01942 487864	<b>Wigan Council Specialist Assessment Team (Adult Social Care Referral Team)</b> Lee Morris QPO .... Tel: 01942 828777 Mob: 07931 408396 <a href="https://www.wigan.gov.uk/Resident/Health-Social-Care/Adults/report-abuse-or-neglect-of-a-vulnerable-adult.aspx">https://www.wigan.gov.uk/Resident/Health-Social-Care/Adults/report-abuse-or-neglect-of-a-vulnerable-adult.aspx</a>
<b>Designated Safeguarding Officer</b> Name: Tony Brown email: <a href="mailto:Tony.brown@expansegroup.co.uk">Tony.brown@expansegroup.co.uk</a> Telephone number: 07738 104279	
<b>Designated Safeguarding Officer</b> Name: Scott Gray Email: <a href="mailto:scott.gray@expansegroup.co.uk">scott.gray@expansegroup.co.uk</a> Tel: 01942 877715	<b>Police</b> Emergency: 999 / Non-emergency: 101 Tel: 0808 2000 247 <a href="https://www.nationaldahelpline.org.uk/">https://www.nationaldahelpline.org.uk/</a>

#### Useful safeguarding contacts

Contact	Role	Organisation
<a href="#">Patricia Darbyshire</a>	Team Manager, Safeguarding	Wigan Council
<a href="#">Reuben Furlong</a>	Assistant Director Safeguarding Adults	Wigan Borough Clinical Commissioning Group
<a href="#">Linda Salt</a>	Head of Safeguarding	Wrightington, Wigan and Leigh NHS Foundation Trust
<a href="#">Jayne Hopewell</a>	Strategic Lead for Safeguarding	Bridgewater Community Healthcare NHS Foundation Trust
<a href="#">Jackie Hodgkinson</a>	Adult Safeguarding Lead	North West Borough Healthcare NHS Foundation Trust
<a href="#">Steve Keeley</a>	Superintendent	Greater Manchester Police

- Disclosure and Barring Service - **0300 0200 190** - [customerservices@dbs.gsi.gov.uk](mailto:customerservices@dbs.gsi.gov.uk) **Procedures for National Safeguarding Lead / on-call Managers in relation to disclosures or causes for concern for The college students.**

### 32. Where a child or adult at risk is in serious danger contact the emergency services via 999 immediately to seek urgent assistance.

#### Under 18:

On receiving report of disclosure or other cause for child welfare concern -  
Alert a social work practitioner in the appropriate Local Authority Safeguarding Team and seek further advice if required.  
Alerts should be made immediately where the concern is about physical or sexual abuse, immediate danger to the victim or another or has been reported to the police.

Other matters should be reported within 24 hours.

#### If the appropriate Local Authority Safeguarding service is Wigan:

Referrals and concerns should be made to:

Wigan Council have established a Multi-Agency Safeguarding Hub (MASH) for Help and Protection of Children

The school can contact the MASH for help and protection of Children with any concerns about children and young people who may need help and protection. MASH will provide help and protection for Children who will receive a range of support, this will involve advice and guidance including signposting to services, early help enquiries, assessment, and support from Start Well or Children's Social Care.

Contact can be made through the following ways:



**Wigan Council**

Telephone contact – 01942 828300 or  
Wigan Safeguarding and Children Board on 01942 486025 or  
[wscb@wigan.gov.uk](mailto:wscb@wigan.gov.uk)  
Email – [EarlyHelp.Logging@wigan.gov.uk](mailto:EarlyHelp.Logging@wigan.gov.uk)

Or through a professional referral: <https://apps.wigan.gov.uk/ChildReferral/>

Wigan LADO - 01942 486042  
Email: [lado@wigan.gov.uk](mailto:lado@wigan.gov.uk)

by writing to: Wigan Safeguarding Children Board, Wigan Life Centre, PO Box 100

Note: In line with good practice, the referrer should usually but not exclusively (and not where this will place the young person at increased risk of significant harm) discuss the matter with the family of a young person and where possible seek their agreement to the referral.

**18 years and over:**

On receiving report of disclosure or other cause for concern for an adult at risk:

- Alert a social work practitioner in the appropriate Local Authority Safeguarding Team and seek further advice if required.
- Alerts should be made immediately where the concern involves sexual abuse, serious physical abuse, immediate danger to the victim or another or has been reported to the police.

Other matters should be reported within 24 hours.

**If the appropriate Local Authority Safeguarding service is Wigan:**

The Wigan Safeguarding Adults Advice Line can be contacted directly to discuss a concern prior to making an alert – **01942 828777 (24 hours) or 0161 834 2436 (Out of hours)**

<https://www.wigansafeguardingadults.org/The-Board/Contact-us.aspx>

To raise an alert, contact the Adult Social Care Help Desk – **01942 828777** (Monday to Friday 9am – 5pm) or visit:

<https://www.wigansafeguardingadults.org/The-Board/Contact-us.aspx> or

<https://apps.wigan.gov.uk/adultsafeguardingreferrals/>

If concerns arise outside the above hours contact:

Emergency Duty Team (EDT) – **0161 834 2436** or the police.

**33. Procedure for Senior Manager / Governor with Safeguarding Responsibilities in the case of an allegation or concern about the behaviour of a member of staff (Including agency staff, governor, contractor or volunteer)**

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If an allegation or a concern is received that a member of staff working or volunteering with a student has:

- behaved in a way that has harmed a student or may have harmed a service- user.
- or
- possibly committed a criminal offence against or related to a student.
- or
- behaved towards a student or students in a way that indicates that person would pose a risk of harm if they work regularly or closely with vulnerable people.

**Regardless of where the alleged abuse took place;** the Allegations Management Procedures must be implemented.

Note: If it is decided by the Local Authority Designated Officer (LADO) or Adult Safeguarding Team that a Strategy Meeting is to be called the Organisation should **not** carry out an investigation until the Strategy Meeting has taken place.

The most senior person not implicated in the allegation with responsibility for Allegation Management or if the complaint is against Chief Operations Officer the Governor with Safeguarding responsibilities must be immediately contacted.

**They should:**

- If a serious criminal offence is suspected inform the police and / or
  - Ensure a written record is completed.
  - Inform the Local Authority Designated Office for Allegations (LADO)
  - Adult Safeguarding Team
  - Follow the advice given by the LADO or Adult Safeguarding Team
- The LADO / Adult Safeguarding Team and senior person/governor will decide if the allegation meets the criteria for a strategy meeting based on whether the member of staff has:
- Behaved inappropriately in a way that has harmed or may have harmed a student; or
  - Possibly committed a criminal offence against or related to a student; or
  - Behaved towards a student in a way that indicates he / she is unsuitable to work with children / young people or vulnerable adults.

Where an allegation is made against another person not a member of staff, governor, volunteer or contractor at the Organisation but who the college has reason to believe is a person who works or is a volunteer with children or vulnerable adults then the college will inform the LADO or Adult Safeguarding Team.

### **34. Disciplinary Procedure**

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The senior person will take advice from the LADO or Adult Safeguarding Team, however, where there is reasonable suspicion that the allegation is serious and the outcome of an investigation could result in the action being gross misconduct, the

Organisation will consider suspending the member of staff in accordance with its disciplinary procedures.

Staff suspension is not in itself a disciplinary action and will be used for the following reasons:

- To protect the student or others from possible further abuse
- To allow a full investigation without the danger of influence by the member of staff
- To protect the member of staff from further allegations

The college recognises that this can be a very uncomfortable experience for the member of staff involved and will seek to support that member of staff either through the Human Resources department and Occupational Health Department

Staff are reminded that a member of staff who is suspended is not guilty of anything at that stage, neither should they discuss the issues with others in the Organisation. This should be respected and staff returning from suspension should be supported and treated professionally.





The Organisation has a statutory duty to refer the individual to the Disclosure and Barring Service where it withdraws permission for an individual to engage in regulated activity or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which is not regulated activity because they think that the individual has engaged in relevant conduct, satisfied the Harm Test or received a caution or conviction for a relevant offence.

The DSL will be responsible for ensuring the Organisation meets this duty.

**Impact of non-compliance for:**

<b>Staff:</b>	Disciplinary action, prosecution, prohibition from teaching.
<b>Student:</b>	Not applicable
<b>Legislation/organisational:</b>	Reputational damage, litigation, statutory and non-regulated compliance. prosecution
<b>Compliance lead:</b>	Safeguarding Lead/Governor
<b>Policy Reference:</b>	ELCO-POL-SAFG-0003
<b>Version:</b>	2
<b>Agreed policy location:</b>	DatabridgeMIS and Company Website
<b>Review Schedule:</b>	12 months
<b>Does the policy require Governor approval?</b>	Yes

**Approval**

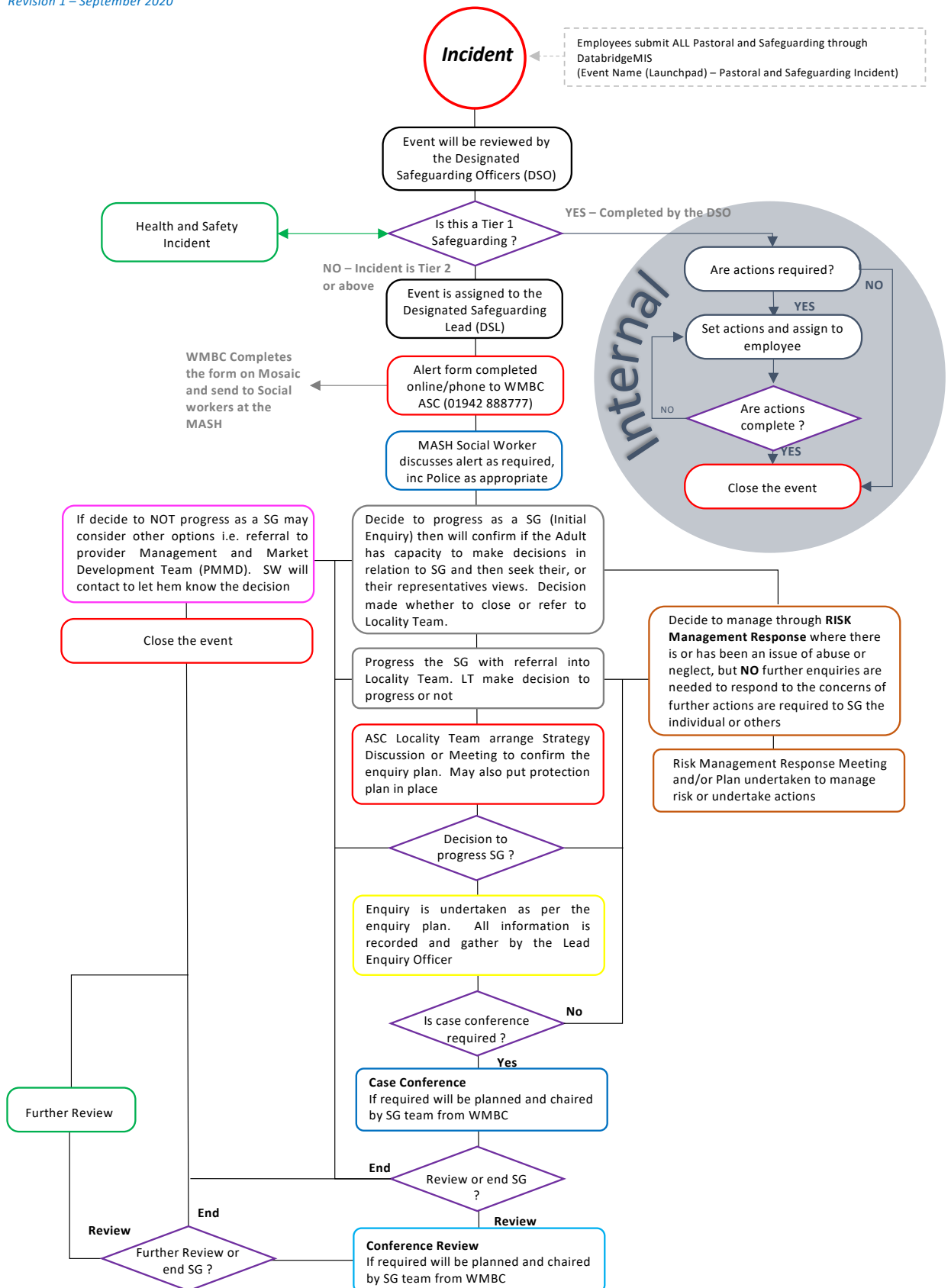
<p>Prepared by <b>Karl Wane</b> 09/11/2022</p>  <p><b>Director of Post 16 Education</b></p>	<p>Approved by <b>Tony Brown</b> 09/11/2022</p>  <p><b>CEO</b></p>	<p>Counter Signatory <b>Richard King</b> 09/11/2022</p>  <p><b>Director of Schools, Pre 16 Education</b></p>	<p>Governor Approval <b>Christine Galligan</b> 09/11/2022</p>  <p><b>Governor (Safeguarding Lead)</b></p>
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**Version Control**

Version	Date	Revision	Review Date
1	01/09/2021	Policy Review	31/08/2022
2	09/11/2022	Policy reviewed in line with KCSIE (2022) and guidance released by the DfE regarding unmanned drones	31/08/2023
3			
4			
5			

## Appendix 1 – Pastoral and Safeguarding Workflow

Revision 1 – September 2020



## Appendix 2 – 5 Tier System



This table should be used alongside the Alert Guidance Document.

Type of Abuse	Tier 1 Managed within own organisation but monitored by (PMMD team Quality Monitoring Systems	Tier 2 Referral passed to L.A. Performance Management and Market Development Team.(PMMD) and enquires made within own organisation and outcome passed to PMMD	Tier 3 Alert Raised to the L.A. Initial Assessment Team (Formerly Central Duty Team) and enquires made in line with Wigan's Multi Agency Policy and Procedures.	Tier 4 Alert Raised to LA Initial Assessment Team (Formerly known as Central Duty Team). Potential Crime and Investigation by Police (PPD) and Safeguarding Procedures in line with WSAB Policy and Procedures. S44 MCA to be kept in mind.	Tier 5 Indicates potential for Safeguarding Adults Review. Safeguarding Board Critical Case Meeting procedure and authorisation of the chair of the WASB required.
Physical Abuse	Staff error causing no or little harm. Resident on resident incidents where both lack capacity. Minor events that still meet the criteria for 'incident reporting'	An incident involving service user on service user where both lack capacity and little or no harm occurs.	Unexplained marks on more than one occasion. Inappropriate restraint. Withholding of food / drinks, aids to independence. Unexplained fractures/injuries	Assault. Inappropriate restraint.	Criteria determined by Care Act and the Wigan Adult Safeguarding Board (WASB)
Physical - Medication	Prescribed medication missed on one occasion with no resulting harm.	Missed medication or administration errors in relation to one service user that cause no harm.	Missed medication or errors that affect more than one adult at risk. Missed medication where harm occurs.	Deliberate maladministration of medication. Covert administration of medication without appropriate medical supervision or legal authorisation.	Criteria determined by Care Act and the Wigan Adult Safeguarding Board (WASB)
Sexual Abuse			Sexualised verbalised teasing. Attempt to take camera/video or use other forms of media to obtain inappropriate pictures. Unwanted sexualised touching. Being made to look at pornographic material against will or where valid consent cannot be given. Being subject to indecent exposure. Attempted penetration by any means without consent (whether or not it occurs within a relationship).	Sex in a relationship characterized by authority, inequality or exploitation. Sex without consent / rape.	Criteria determined by Care Act and the Wigan Adult Safeguarding Board (WASB)
Psychological	Adult is spoken to in an inappropriate way but no distress caused.	Occasional taunts or verbal outburst by fellow residents where no distress is caused.	Treatment that undermines dignity and damages self esteem Denying or failing to recognise an adult's choice or opinion. Verbal outburst, bullying, inappropriate comments by staff members/family members or friends. Humiliation Emotional blackmail e.g. threats of abandonment /harm/threats to kill. Frequent and frightening verbal outbursts.	Denial of basic human/civil rights, overriding advance directive, forced marriage. Prolonged intimidation Vicious personalised verbal attacks. Hate crime (see also Discriminatory abuse).	Criteria determined by Care Act and the Wigan Adult Safeguarding Board (WASB)
Financial Or Material Abuse	Staff personally benefit from support given to adult e.g. accrue reward	Adult not routinely involved in decisions about how money is spent or kept safe-	Adult denied access to own funds or possessions. Monies kept in joint bank account – unclear arrangements for equitable	Theft. Fraud/exploitation relating to benefits, income. Property or	Criteria determined by Care Act and the Wigan Adult Safeguarding Board

	points on store loyalty cards. No detriment to the adult.	capacity not properly considered.	sharing of interests. Misuse /misappropriation of property, possessions or monies by a person in a position of trust or control. Personal finances removed from adult's control.	will.	(WASB)
<b>Neglect and acts of omission</b>	Isolated missed care visits or required assistance not provided on an isolated incident where no harm occurs.	Inadequacies in care provision that lead to discomfort or inconvenience – no significant harm occurs.	Recurrent missed home care visits where risk of harm escalates or one missed visit where harm occurs. Hospital discharge without adequate planning and where harm occurs as a result. Partner refuses to pay for care. Deliberate deprivation of access to aids for independence Ongoing lack of care to the extent that health and well-being deteriorate significantly e.g. pressure wounds, dehydration, malnutrition loss of independence/confidence, Grade 3 or 4 pressure sores - Tissue Viability Guidance issued by CCG and advice from clinical experts should be sought.	Failure to arrange access to life saving services or medical care. Failure to intervene in dangerous situations where adult lacks capacity to assess risk.	Criteria determined by Care Act and the Wigan Adult Safeguarding Board (WASB)
<b>Organisational Abuse</b>	Lack of stimulation/ opportunities for people to engage in social and leisure activities. Adults not given sufficient voice or involvement in the	Care planning/documentation not person-centered	Rigid/inflexible routines. Adults dignity is undermined e.g. lack of privacy during support with intimate care needs, shared clothing. Denial of individuality and	Over medication and/or inappropriate restraint used to manage behaviour Widespread consistent ill treatment.	Criteria determined by Care Act and the Wigan Adult Safeguarding Board (WASB)
	running of the service.		opportunities for adults to make informed choices and take informed risks. Staff misusing their position of power over adults. Bad practice not being reported and going unchecked Unsafe and and/or unhygienic living environments. Mismanagement of infection outbreaks.		
<b>Discriminatory Abuse</b>	Isolated incident of a prejudicial remark being made to an adult but no distress caused.	Care planning fails to address an adult's diversity and associated needs for a short period. Isolated incident of teasing motivated by prejudicial attitudes. No harm occurs. (If not staff members.)	Inequitable access to service provision as a result of diversity issues. Recurring taunts. Recurring failure to meet specific needs associated with diversity. Being refused access to essential services. Denial of civil liberties e.g. voting, making a complaint. Humiliation or threats.	Hate crime resulting in injury / emergency medical treatment/fear for life.  Hate crime resulting in serious injury / attempted murder / honour based violence.	Criteria determined by Care Act and the Wigan Adult Safeguarding Board (WASB)

### Appendix 3 – DatabridgeMIS (Event – Pastoral and Safeguarding Incident)

Main Details - --Select-- - 0

Site

Expanse Learning (College)

Stu. Status

Current Student (On Roll)

Category

(Launchpad) - Pastoral & Safeg

Student

--Select--

Staff

Doe, John ()

Date

13-10-2020

Time

19:11

Location

--Select--

Duration (Mins)

0

Status

--Not Set--

Externally Reported

☐

Documents

Add

Reset

Send Message To

Add Recipient

Automatic notifications may be applied to this Event

View Details

Actions

Date	Set By	For	Action	Comments	Completed By Date	Completed
<div>Add Action</div>						

Safeguarding Categories

Tier Rating:

--Select--

Category:

--Select--

Details of Staff Member completing the incident form (this should be the person who has been involved in the incident or witnessed concerns):

Job Role:

Line Managers email address:

Address/Place of work:

Details of incident (please include as much information as possible):

Details:

Details of incident (please include as much information as possible):

Details:

Please provide brief details of any internal investigation undertaken and what changes has the Service/Organisation made or implemented to reduce the risk of similar incidents reoccurring?

Details:

Agreed Action(s)

Details:

Body Map

Add Male Body Map

Add Female Body Map

Remove Last Body Map