The Westminster Specialist College

2025/2026

Safeguarding Adults Policy

Approved by Board of Governors on:	**14/10/2025**
Head of College:	O Flowers
Lead Personnel:	**B Taylor**
Date of Review:	**September 2026**

This policy also takes into account Keeping Children Safe in Education (DfE, 2025) and Working Together to Safeguard Children (HM Government, 2023). Although the College primarily supports learners aged 18+, some learners may be under 18 (for example at the start of the DFN Project Search), therefore all provisions of KCSIE 2025 relating to children are applied in full.

Scope and Purpose

This policy is for use by all employees, governors and volunteers of The Westminster Specialist College. The College has a legal and professional obligation to safeguard its students. This policy is to provide:

- Definitions of safeguarding
- Types of abuse
- Direction and guidance on how to recognise and respond to safeguarding concerns

Abuse is a complex issue. Every effort will be made to ensure individuals' wishes are ascertained and considered before action is taken.

This Policy takes into account:

1. Care Act 2022
2. The Sexual Offences Act 2003
3. The Human Rights Act 1998
4. Mental capacity Act 2005
5. Working Together to Safeguard Children (Department for Education 2023)
6. Safeguarding Vulnerable Groups Act 2006
7. Equality Act 2010

Definition of Adult at risk

An Adult at risk is a person over 18 who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or at risk of, abuse or neglect; and;
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Safeguarding Personnel

The DSL (Designated Safeguarding Lead) and deputies will have had up-to-date safeguarding training (renewed every 2 years) and will update their knowledge and skills at least annually, in line with KCSIE 2025.

The Governing Body has appointed a designated safeguarding governor with strategic responsibility to oversee safeguarding arrangements and hold leaders to account.

The Designated Safeguarding Lead (DSL) for the College is:

Ben Taylor – 0121 561 6884

The Deputy Safeguarding Lead for the College is:

Denise Taylor – 0121 561 6884

The named Safeguarding Governor is:

Oliver Flowers – 0121 561 6884

Safeguarding at The Westminster Specialist College

Safeguarding education is embedded across the curriculum. This includes explicit teaching on online safety, risks of misinformation/disinformation and conspiracy theories, and safe use of emerging technologies including artificial intelligence (AI), in accordance with KCSIE 2025.

The Westminster Specialist College adapts a person-centred care approach. As a result, the college will endeavour to:

- Value people and those who care for them – promoting their rights and entitlements regardless of age, cognitive ability, race, gender etc
- Treat people as individuals who have a unique history and personality, physical and mental health, and who have individual health and socio-economic resources
- Looks at the world from that person's perspective
- Values the person's relationships and encourages these.

Six Principles of Safeguarding Adults

The following six principles from the Care Act (2022) informs the way in which staff at The Westminster Specialist College should work with adults:

1. Empowerment – Learners are supported and encouraged to make their own decisions and give informed consent where appropriate.

   "I am asked what I want as the outcomes of the safeguarding process and these directly inform what happens."

2. Prevention – It is better to take action before harm occurs.

   "I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

3. Proportionality – The least intrusive response appropriate to the risk presented.

   "I am confident that staff will work in my best interests, as I see them, and they will only get involved as much as needed."

4. Protection – There is support and representation for those in greatest need.

"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

5. Partnership – Local solutions through services working with their communities.
   "I know that staff treat any personal and sensitive information in confidence, only sharing what is needed. I am confident that professionals will work together with me to help me."

6. Accountability – There is accountability and transparency in delivering safeguarding.

   "I understand the role of everyone involved in my life, and so do they."

Definitions and Types of Abuse

Abuse is a violation of an individual's human and civil rights by any other person(s) which may result in significant harm. It may be a single act, repeated acts, an act of neglect, or a failure to act or multiple acts (Care Act, 2022). Types of abuse are variable and may be described as:

Online Abuse –

Abuse that occurs via the internet, social media, or digital devices. This includes online grooming, sexual exploitation, cyberbullying, coercion, distribution of sexualised content, exposure to harmful content, disinformation, conspiracy theories, and unsafe use of AI-generated content.

Physical Abuse

This includes injuries which are not explained satisfactorily or where there is concern that the injury was inflicted intentionally. Pushing, shaking, pinching, slapping, punching and force-feeding could come into this category depending on the circumstances in which they occurred.

Physical abuse can also include situations where people are caused unreasonable physical discomfort through the withholding of care or the application of inappropriate techniques or treatment. Deprivation and forcing of food and water and involuntary isolation and confinement (e.g. inappropriate methods of restraint) can be physical abuse. Physical abuse can include forcing of prescribed or no prescribed medication against the person's will or covertly medicating without a Deprivation of Liberty Safeguards authorisation and best interest plan.

Sexual Abuse

Sexual abuse is the involvement of a person in sexual activities or relationships that either they do not want, have not consented to or they cannot understand; this may include inappropriate looking/touching, sexual harassment, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual teasing, innuendo, sexual assault and rape.

Psychological Abuse

Psychological abuse includes the use of verbal and physical threats, fears of bribes to:

- Negate an adult an individual's choices and independent wishes
- Cause isolation or over-dependence
- Prevent an individual from using services which would otherwise aid and extend them

Psychological abuse includes intimidation, humiliation, shouting, swearing, emotional blackmail, bullying and the denial of basic human and civil rights (including choice and opinion, privacy and dignity and allowing people to follow their own spiritual or cultural beliefs or choice about their own sexuality).

Neglect or Acts of Omission

Neglect or Acts of Omission relates to ignoring or withholding physical or medical care needs, including the deprivation of help to perform activities of daily living and failure to intervene in behaviour, which is dangerous to the individual concerned or to others. This can also involve allowing a person judged to lack capacity under the Mental Capacity Act to make decisions to take unwarranted and unreasonable risks.

Neglect may be regarded not only as the commission or omission of an act, but also the threat of risk of such. Neglect may also occur as a result of unintentional actions by involved professionals or carers in not responding adequately to the needs of the vulnerable person. This can occur where the person responsible lacks the physical, financial and/or mental resources to provide sufficient care or lacks knowledge about their dependant's illness or disability and have not received guidance or support on how to care

Discriminatory

A violation of human and civil rights by any other person or persons. This is abuse which is racist or sexist in nature or about a person's disability or sexuality.
Discrimination includes any form of harassment or bullying. There is some cross-over with other forms of abuse. Other examples of discriminatory abuse are:

Age
Gender and Gender identity
Being married or in a civil partnership
Being pregnant or having a child with a disability
Race (including colour, nationality, ethnic or national origin)
Religion

Organisational

When the lifestyles of individuals are sacrificed in favour of the rituals, routines and/or restrictive practices of the home or care setting. Care may not be individualised, rules may be used inappropriately, and there may be a lack of stimulation.

Self-Neglect

A wide range of behaviour such as neglecting to care for personal hygiene, health or surroundings. This could include hoarding, failure to complete personal care or attend to own health needs.

Domestic Abuse

Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality.

Modern Slavery

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. Including human trafficking, forced labour, domestic servitude and sexual exploitation.

Financial Abuse

This involves an individual's resources being inappropriately used to the advantage of another person. It includes the withholding of money or inappropriate or unsanctioned use of a person's money or property, usually to the disadvantage of the adult to whom it belongs.

Examples of financial abuse include:
Theft and Fraud
Exploitation
Internet scamming
Undue pressure in connection with wills, property, inheritance or financial transactions
Misuse or misappropriation of property, possessions or benefits
The misuse of an enduring power of attorney or a lasting power of attorney, or appointee-ship

Signs of Abuse

What to look for (these are examples and not an exhaustive list of physical signs):

- Bruising, including bruising in well protected areas, e.g. the inside of the thighs or upper arms or bruising at different stages of healing
- Burns, especially if in unusual places
- An injury similar in shape to an object
- Unexplained fractures
- Under or overuse of medication
- Unexplained weight loss
- Unkempt appearance, for example, unshaven, inadequate or dirty clothing

Psychological/Behavioural signs

- Appearing depressed, frightened, withdrawn, agitated, anxious or aggressive
- Sudden withdrawal from previously liked activities
- Self-isolation (when it is unusual for the individual)
- An unexpected/unexplained change in behaviour
- Loss of appetite

- Sleeplessness or nightmares
- Increase in inappropriate or seductive behaviour
- Mimicking of explicit sexual activity

Radicalisation

Staff will be trained annually on Prevent Duty, including recognising risks associated with online radicalisation and extremist narratives spread via social media or AI-generated content.

For the purposes of this policy, “extremism” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs.

Extremism also includes calling for the death of members of the armed forces. For the purposes of this policy, “radicalisation” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “terrorism” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause. Protecting students from the risk of radicalisation is part of the college’s wider safeguarding duties. The college will actively assess the risk of students being radicalised and drawn into extremism and/or terrorism.

Staff will be alert to changes in students’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The college will work with local safeguarding arrangements as appropriate.

The college will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the college will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the student’s parents, unless the college has reason to believe that the young adult would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect students against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

Signs of Radicalisation

- Overly secretive about internet use
- Isolation/withdrawal
- ‘Them and Us’ mentality
- Strong viewpoints expressed aggressively, which may involve “scripted speech”
- Questioning faith/identity
- Altered appearance, including appearance of new tattoos
    - Unusual behaviour/abnormal routines

Prevent Duty

The Prevent duty Under section 26 of the Counter-Terrorism and Security Act 2015, all colleges are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “the Prevent duty”. The Prevent duty will form part of the college’s wider safeguarding obligations.

The Prevent Duty is a part of the UK’s counter-terrorism strategy that aims to prevent terrorist attacks before they occur, by preventing individuals vulnerable to radicalisation from being drawn into performing terrorist acts.

How our learners are vulnerable:

- Easily manipulated
- Trusting of others
- Led or befriended
- Unsupervised at times/independent use of the internet
- Limited understanding of consequences
- Learning difficulties

Assessing the Risk

Engagement – a person’s susceptibilities, motivations and influences Intent – is the individual ready to use violence to promote their views? Capability – do they have the skills, resources and networks to commit acts of terrorism?

- Self-injury
- Aggression to one particular person

Homelessness

The DSL and DSP(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to ADULT SOCIAL CARE where a young adult is being harmed or at risk of harm.

The number for Sandwell Housing solutions is 01215696883

Reporting Concerns

It is the responsibility of staff including volunteers to report concerns; NOT to decide whether the concern is or is not abuse. The need to protect the 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.

All concerns should be reported to the DSL using the **Safeguard Software**. This should be done before the young adult leaves site. If you are concerned that the young adult is in immediate danger, this should be reported to the DSL immediately or, in their absence, the Deputy DSL. This should take priority over anything else. The college will endeavour to always ensure that a member of the safeguarding team is available at all times, preferably in person onsite. Posters are visible around the college so staff, students, parents and visitors know who to contact or speak to if they have a safeguarding concern.

Abuse is usually discovered in three ways:

- The person discloses to someone that abuse has or may have occurred
- Someone sees the abuse occur
- Someone identifies signs and symptoms that may indicate abuse.

The first concern has to be the protection and safety of the individual, who is vulnerable and may need the staff to voice concern on their behalf.

If staff suspect or come across a case of abuse, they should:

1. Ensure the victim is safe and removed from danger, IF A CRIME IS SUSPECTED the DSL MUST CALL 999 IMMEDIATELY.
2. Do not contaminate any evidence particularly if you suspect sexual abuse
3. i.e. do not change clothes.
4. Inform the relevant Designated Safeguarding Lead immediately and ask for guidance on how to proceed.
5. Unless an individual wishes it, never discuss the matter with them if others are present, as they may be too afraid or ashamed to talk.
6. Never discuss concerns with a possible abuser at any stage. This might put the individual at risk and could lead to further problems.
7. Always respect the needs and wishes of the individual who might be the victim of abuse.
8. Be sensitive to the religious and cultural background.
9. Never ‘cover up’ for a colleague who is suspected of being abusive.
10. Always report any incidents or suspicions to the appropriate Designated Safeguarding Lead. If the suspicion is related to a colleague, this should be reported directly to the Head of College.
11. Always check that action has been taken.

After you have raised a concern, the Designated Safeguarding Lead will decide how to respond which will usually involve making internal enquiries, but it may become necessary to carry out a full investigation which may be formal or informal depending on the nature of the concern raised. The college will endeavour to complete investigations within a reasonable time. Staff will be kept informed of progress and also when the investigation is completed. The safeguarding team will not be able to inform you of any matters which would infringe any duty of confidentiality owed to others.

Informing parents/carers and other relatives

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

- The parent or close family member is suspected of being involved with the abuse.
- The person is age 18 years or over and specifically asks that their parents are not informed – in these circumstances we will work actively with the person to gain their consent.

• There is reasonable grounds to suspect that talking to the parent may cause harm to himself or herself or the young adult.

Early Help

Staff will also be trained to recognise when persistent absence, poor attendance at work placements, or sudden disengagement may indicate safeguarding concerns. This aligns with KCSIE 2025 emphasis on safeguarding through attendance monitoring.

Early help means providing support as soon as a problem emerges, at any point in a young adult's life. Any student may benefit from early help, but in particular, staff will be alert to the potential need for early help for students who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the college day.
- Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to Adult social care for assessment for statutory services if the student's situation is not improving or is worsening.

Peer on Peer Abuse

The College recognises that harmful sexual behaviour (HSB) may occur between peers and will respond with the same seriousness as for adult-perpetrated abuse. Responses will be proportionate, trauma-informed, and consider the needs of both the victim and the alleged perpetrator.

For the purposes of this policy, “peer-on-peer abuse” is defined as abuse between young adults. The college has a zero-tolerance approach to abuse, including peer-on-peer abuse. All staff will be aware that peer-on-peer abuse can occur between students of any age and gender, both inside and outside of college, as well as online. All staff will be aware of the indicators of peer-on-peer abuse, how to identify it, and how to respond to reports.
All staff will also recognise that even if no cases have been reported, this is not an indicator that peer-on-peer abuse is not occurring.
All staff will speak to the DSL if they have any concerns about peer-onpeer abuse.
All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Peer-on-peer abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Up skirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

All staff will be clear as to the college’s policy and procedures regarding peer-on-peer abuse and the role they have to play in preventing it and responding where they believe a young adult may be at risk from it.

All staff will be made aware of the heightened vulnerability of students with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student’s SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ students, who evidence suggests are also more likely to be targeted by their peers. In some cases, students who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ students.

The college’s response to sexual violence and sexual harassment between students of the same sex will be equally as robust as it is for incidents between young adult of the opposite sex. Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Students will also be reassured that they will be taken seriously, be supported, and kept safe. The college’s procedures for managing allegations of peer-on-peer abuse are outlined in the Peeron-Peer Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the college’s Behaviour Policy and Exclusion Policy, where relevant

Safeguarding on Work Experience

For all DFN Project Search and other work placements, the College will:

- Ensure placement providers have appropriate safeguarding policies.
- Conduct safeguarding risk assessments prior to placements.
- Provide safeguarding induction for placement supervisors.
- Establish clear reporting lines for safeguarding concerns raised by or about students while on placement.
- Ensure safer transport arrangements are in place, where applicable.

When a student is sent on work experience (including Project Search), the college will ensure that the provider has appropriate safeguarding policies and procedures in place.

Concerns about Handling of Safeguarding Incidents
If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the principal. If the concern is with regards to the principal, it will be referred to the associated lead for the college, Mr O Flowers
Any concerns regarding the safeguarding practices at the college will be raised with Mr Oliver Flowers, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.
If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

Training

All staff members will complete Level 1 safeguarding and child protection training (minimum level). This will take place every September. Staff members who join mid-way through the year will complete online training as designated by the DSL. In addition, staff will complete a Safeguarding Adults course.

Safeguarding training will cover Level One content and also cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment
- Contextual safeguarding
- How to keep previously LAC safe
- Criminal exploitation
- The Prevent Duty

The DSL and their deputies will undergo online safety training to help them recognise the additional risks that young people with SEND face online to ensure they have the capability to support these young people to stay safe online.

All staff, governors, volunteers and placement providers will receive safeguarding induction.

Online safety training will include content on cyber-risks such as online grooming, sexual exploitation, financial scams, misinformation, conspiracy theories, and the risks associated with AI tools.

Roles and Responsibilities

Role	Responsibility
Designated Safeguarding Lead	• The designated safeguarding lead should liaise with their local Safeguarding Adults Team and work with other agencies in line with the Care Act (2022) • During term time, the designated safeguarding lead should always be available (during college hours) for staff to discuss any safeguarding concerns; • The designated safeguarding lead 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 as set out above, their knowledge and skills should be updated (for example via ebulletins, 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. • Refer cases of suspected abuse to the relevant Adult Safeguarding Team, or other relevant professional such as the individual's GP, as required; • Be knowledgeable about different referral processes for different Local Authorities. • Refer cases to Prevent where there is a radicalisation concern as required; • Refer cases where a crime may have been committed to the Police as required; • Act as a source of support, advice and expertise for all staff;
Deputy DSL	• Support the DSL and act as a point of contact in their absence. • Assist in managing referrals, reports, and safeguarding incidents. • Contribute to staff training and awareness efforts. • Take part in investigations and maintain safeguarding records. • Offer advice and guidance to the Designated Safeguarding Lead where appropriate • Attend meetings linked to safeguarding in the absence of the DSL

Teaching Staff	• Understand and follow the safeguarding policy and procedures. • Be vigilant and proactive in identifying potential safeguarding concerns (e.g., signs of abuse, neglect, or exploitation). • Report any concerns about a student's welfare immediately to the DSL or Deputy DSL. • Build trusting, supportive relationships with students to promote a safe learning environment. • Maintain appropriate boundaries and professionalism in all interactions with students. • Attend safeguarding training and keep up to date with safeguarding developments. • Work closely with other professionals to support students' well-being.
Non Teaching Staff	• Provide direct support to students, particularly those with special educational needs or disabilities. • Monitor and report concerns about students' physical, emotional, or social well-being. • Work closely with teachers, DSL, and external agencies to provide holistic support for vulnerable students. • Maintain confidentiality and sensitivity when dealing with safeguarding issues. • Contribute to the creation of safe and supportive learning environments.
Students	• Be aware of the safeguarding support available to them. • Report any concerns about their own or others' well-being to a trusted staff member. • Participate in safeguarding-related education and awareness programs to understand how to keep themselves safe. • Engage in respectful, responsible behaviour with peers and staff.
Parents/Carers	• Be aware of the college's safeguarding policy and practices. • Communicate any concerns regarding their child's safety or well-being to the appropriate staff member. • Support the college's safeguarding initiatives and work in partnership to promote student welfare.

Supporting learners with mental health concerns

Mental health difficulties can be an indicator of abuse, neglect, or exploitation. Staff will be trained to recognise signs and to make safeguarding referrals where concerns are identified.

- Under the Care Act (2014), mental health concerns do not meet the threshold for Multi-Agency Safeguarding Hub support, however in some cases mental health difficulties can cause concerns to the individual's welfare.
- Where there is a concern about a young adult's mental health, consent will be gained from them to refer for additional support, including their GP, or their local community learning disability team.
- Where consent for referrals has not been granted, the College will support the learner as much as possible to understand their options for additional support.

Working with a Learner's Support Network

- Parents and carers play an important role in protecting their son/daughter from harm. The college will support parents/carers to prevent potential safeguarding concerns from arising – or, in the event of a concern being raised, supporting their son/daughter with the outcome of this and what might need to be put in place in the future to support the young person.
- The learner's views will be considered in deciding whether to inform the family.
- The College aims to help parents understand that the College, like all others, has a duty to safeguard and promote the welfare of all learners. The College may need to share information and work in partnership with other agencies when there are concerns about a learner's welfare.

Creating a Safe Environment

There are many ways in which we aim to create a safe environment, including:

- Regularly reviewing individualised risk assessments, support and learning plans where appropriate
- Ensuring safeguarding is discussed regularly with senior management where appropriate
- DBS checks for all staff and students
- Internal policies and procedures including complaints, whistleblowing, health and safety
- Regular training including safeguarding and Prevent
- Providing accessible information
- Working and linking with other professionals
- Clear and effective channels of communication

Suspension or Termination of a Placement

Creating a safe environment must also include considerations of when it is necessary to suspend or terminate a young adult's placement in relation to significant safeguarding concerns. The College reserves the right to suspend the placement of a learner who is being investigated by the police or social care. If a safeguarding allegation against a learner who is the suspected perpetrator is substantiated (for example, a learner was found to be involved in child grooming), a risk assessment must be conducted to assess the appropriateness of the learner returning to the College.

Prevention in the Curriculum

Safeguarding education will be tailored to meet the needs of learners with SEND. Accessible formats, simplified language, and adaptive delivery methods will be used to ensure all learners understand how to keep themselves safe.

As the college intent states the desire for students to gain meaningful paid employment safeguarding plays a pivotal role in the curriculum. Students should be able to know how to feel safe when in the workplace and at college and understand what to do when they don't feel safe. Students will cover units of work within their qualification that include managing healthy relationships in the workplace, Health and Safety in the workplace. Students are also allocated 1.5 hours of Relationships and Sex Education (RSE) which also supports them to develop their understanding of key topics to keep them safe. Additionally:

- The College recognises the importance of developing learners' awareness of behaviour that is unacceptable towards them and others, and how they can help keep themselves and others safe.
- The College curriculum provides personal development opportunities for learners to learn about keeping safe and who to ask for help if their safety is threatened. As part of developing personal skills, learners are taught to, for example:
    - Safely explore their own and others' attitudes;
    - Recognise and manage risks in different situations and how to behave responsibly;
    - Judge what kind of physical contact is acceptable and unacceptable;
    - Recognise when pressure from others (including people they know) threatens their personal safety and well-being and develop effective ways of resisting pressure, including knowing when and where to get help;
    - Internet Safety.

Related Legislation

<u>Mental Capacity Act 2005 (MCA)</u>

This sets out very clearly how we assess for capacity and make best interest decisions. The main principles of the act are:

1. A person must be assumed to have capacity unless it is established that they lack capacity.
2. A person is not to be treated as unable to make a decision unless all practicable steps to help him/her have been taken without success.
3. A person is not to be treated as unable to make a decision merely because it is seen as an unwise decision.
4. Anything done for or on behalf of a person who lacks capacity must be in their 'best interests'.
5. Anything done for or on behalf of a person who lacks capacity must be the 'least restrictive' of their rights and freedoms.

An assumption about a person's capacity to make decisions cannot be based upon their condition, appearance, behaviour or age. Capacity assessments are decision and time

specific – a person cannot be assumed to lack capacity in a general context, only in relation to a specific decision.

The Act also covers the criminal act of wilful neglect or ill-treatment of an adult lacking capacity. This is punishable by up to five years in prison.

Deprivation of Liberty

The Deprivation of Liberty Safeguards (DoLS) are an amendment to the MCA. They state that it is unlawful to deprive someone of their liberty. In some cases, however, where a person lacks capacity to make decisions about their own care and needs to be deprived of their liberty in order to receive the care they need, a care home or hospital may apply for authorisation to do this. Someone is deprived of their liberty if they're:

- Unable to consent to their care or treatment
- Not free to leave where they are staying
- Supervised all the time

Sexual Offences Act 2003

This states it is illegal for a person providing care to engage in sexual activity with someone receiving care.

Those in 'relationships of care' (social workers, GPs, care and education support staff, NHS staff, home care workers, friends who provide care, assistance or services in connection with the person's mental disorder) should not engage in any sexual act with a person within their care.

This applies both to those who do not have capacity to consent, and those who 'may or may not be able to consent to sexual activities but who are vulnerable to inducements, threats or deceptions because of their mental disorder'.

Human Rights Act 1998

This gives everyone the right to live free from abuse and violence and degrading

treatment, under Article 2 – Right to life protected by law

Article 3 – Freedom from torture or inhuman or degrading treatment

Article 5 – Right to liberty and security of person

Article 14 – Freedom from discrimination, including age or disability

Public Interests Disclosure Act 1998

This protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing.

Workers are protected from dismissal and a right not to be subjected to any 'detriment' from their employer if they make a 'protected' disclosure.

To qualify for protection, disclosures must be concerning something that has happened, is happening or is likely to happen in the future such as criminal offence, breach of a legal

obligation, miscarriage of justice, danger to health or safety of any individual, damage to the environment.

Care Act 2014

Conditions for Care and Support Needs

When determining eligibility for care and support needs under the Care Act (2014), a social worker will consider the following three conditions:

Condition 1 - The adult's needs for care and support arise from or are related to a physical or mental impairment or illness and are not caused by other circumstantial factors.

This includes if the adult has a condition as a result of physical, mental, sensory, learning or cognitive disabilities or illnesses, substance misuse or brain injury.

Condition 2 - As a result of the adult's needs, the adult is unable to achieve two or more of the outcomes specified in the regulations and outlined in the section 'Eligibility outcomes for adults with care and support needs'.

Condition 3 - As a consequence of being unable to achieve these outcomes, there is, or there is likely to be, a significant impact on the adult's wellbeing, determining whether:

- the adult's needs impact on at least one of the areas of wellbeing in a significant way or
- the cumulative effect of the impact on a number of the areas of wellbeing means that they have a significant impact on the adult's overall wellbeing.

(Source: https://www.scie.org.uk/care-act-2014/assessment-and-eligibility/eligibility/criteriaadults-care.asp)

The College can request an assessment for a young adult if this is deemed appropriate.

Monitoring and Review

The policy will be reviewed at least annually and immediately updated in line with changes to DfE statutory guidance. Safeguarding audits will be undertaken termly, with findings reported to the Governing Body.

This policy is reviewed at least annually by the DSL and the principal. The policy may be adapted as when needed due to any safeguarding issues that arise within the year. This may also include any lessons that have been learnt by the college.

Any changes to the policy before the proposed review date will be communicated to staff, students and parents accordingly.

The proposed review date of this policy is **September 2026.**

Appendix 1 – Useful contacts and links

Sandwell Adults Safeguarding:
https://www.sandwell.gov.uk/info/200216/adults_and_older_people/2213/safeguarding_adults

Reporting adult abuse (Sandwell):
https://www.sandwell.gov.uk/info/200216/adults_and_older_people/2209/report_adult_abuse

or 0121 569 2266

Worcestershire Local Authority

https://www.worcestershire.gov.uk/council-services/adult-social-care/safeguarding-and-concerns-about-adult/report-safeguarding-concern-about-adult

Advice line – 01905843189

Worcester Safeguarding Adults Board

https://www.safeguardingworcestershire.org.uk/wsab/

Birmingham Local Authority

https://www.birmingham.gov.uk/info/20018/adult_social_care/111/report_possible_abuse_or_neglect_of_an_adult_with_care_and_support_needs#:~:text=You%20can%20also%20report%20a,the%20full%20national%20phone%20number

https://forms.olmapps.com/ewfprod/manage/view/#/form/bccsafeguardingconcernlive?header=1&reset=1

Email – CSAdultsocialCare@birmingham.gov.uk

Phone – 01213031234

Dudley Local Authority

https://dudleysafeguarding.org.uk/adults/

https://adultssocialcare.dudley.gov.uk/web/portal/pages/professional/safeconcernpro#assess

Contact number – 0300 555 0055

Walsall Local Authority

https://walsallsp.co.uk/contact-us/concerned-about-an-adult/ - Adult safeguarding Concern form can be completed from this link.

Contact Number – 0300 555 2922

Textphone - 07919014925