Futureworks

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If this document is required in an alternative format, please contact Futureworks on 0161 214 4600 or via email: info@futureworks.ac.uk

Futureworks

Safeguarding Policy and Procedure

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Futureworks

1 Introduction - what is safeguarding?

1.1 Futureworks has always recognised the responsibility we have to safeguarding and supporting the welfare of our students. The health, wellbeing, welfare and safety of all students is of paramount importance.

1.2 In the case of an emergency, or when an individual is at immediate risk of harm, you must call the emergency services Tel. 999.

1.3 We endeavour to provide a welcoming, safe and supportive environment for our student community. Student-facing staff play a huge part in recognising possible signs of neglect or change in students and it is part of the success of Futureworks as an institution that staff are actively alert to this. However, safeguarding at Futureworks is often regarded as the responsibility of Student Services and is carried out in the main by our Student Welfare Officer, with decisions confirmed by the Head of Student Services.

1.4 In simple terms, safeguarding is the action taken to protect people from harm and to promote their wellbeing. Of course, this happens every day at Futureworks and staff strive for excellence in delivering this care. Our students are adults and in adult education, so whilst we acknowledge that staff cannot and should not act in 'loco parentis,' we do have a general duty of care, although this is not statutory. Responsibility for wellbeing rests with the student as an adult, and Futureworks works with individual students, parents, carers, and applicable agencies to deliver its safeguarding responsibilities and to promote the welfare of all.

1.5 Adult safeguarding duties apply to any adult (ages 18 years or more) who:

1.5.1 has care and support needs

1.5.2 is experiencing, or is at risk of, abuse or neglect and is unable to protect themselves from abuse or neglect because of their care and support needs

1.6 It can also include a change in circumstances, such as bereavement, temporary financial difficulties or becoming ill.

1.7 An adult at risk is someone aged 18 and over who:

1.7.1 has a physical, sensory or learning disability

1.7.2 has mental health problems or substance abuse difficulties

1.7.3 is ill or frail and unable to look after themselves

1.7.4 is suffering from dementia or a diminished capacity to make informed decisions regarding their welfare

1.8 Not every student who has support needs is at the risk of abuse or neglect, but a large number of our students will fall into the category of "a change of circumstances".

1.9 Safeguarding is about promoting an adult's wellbeing and respecting their choices. At Futureworks we value this person-centered approach.

2 Policy

2.1 Statement of intent

2.1.1 Futureworks recognises that:

- we have a responsibility to safeguard the welfare of:
  - children within the Futureworks community;
  - adults at risk within the Futureworks community;
  - those children and adults at risk who come into contact with Futureworks activities; and
  - Futureworks students at risk of harm.
- the welfare of the child, adult at risk or Futureworks student for whom we have duty of care is paramount.
- where we have a duty of care, all individuals, regardless of age, disability, sex, race, religion, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity have the right to equal protection from all types of harm or abuse.
- we must work in partnership with those for whom we have a duty of care and with appropriate individuals and agencies as this is essential in promoting safeguarding.

2.1.2 For the purpose of this Policy, Futureworks has safeguarding responsibilities in relation to:

- all current Futureworks students;
- prospective students engaged in Futureworks activities and/or activities hosted by Futureworks;

- adults at risk registered as or prospective students (as above);
- children and adults at risk who are engaged in Futureworks activities and/or activities hosted by Futureworks;
- children and adults at risk who are not directly engaged in Futureworks activities, but who are connected to Futureworks;
- staff in the course of their duties; and
- external organisations/individuals where we engage in branded activities.

2.2 Objectives

2.2.1 The purpose of this Policy is to:

- reflect the legislative context and also take account of relevant guidance and good practice relating to the education sector;
- provide protection for the children, young people and adults at risk who come into contact with Futureworks; and
- provide staff, students and volunteers with guidance on procedures that must be adopted:
    - to ensure safeguarding; and
    - in the event that they suspect someone may be experiencing, or be at risk of, harm.

2.3 There are legal and policy requirements relating to our engagement with others, including but not limited to:

- Health and Safety at Work Act (1974)
- Equality Act (2010)
- Data Protection Act (2018)
- Counter-Terrorism and Border Security Act 2019
- Mental Capacity Act (2005)
- Children Act (2004)
- Children Act (1989)
- Education Act (2002)
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2024)

- DBS Code of Practice November (2015)
- No Secrets (2012)
- Care Act (2014)
- Safeguarding Vulnerable Groups Act (2006)
- Human Rights Act (1998)
- Sexual Offences Act (2003)
- Rehabilitation of Offenders Act (1974)
- UN Convention on the Rights of the Child (1989)
- Data Protection Act (1998)
- Care Act (2014)
- Protection of Freedoms Act (2012)
- Local Government Act (2000)
- The Prevent Duty
- The Charity Commissions: Safeguarding children and young people

2.4 The COO is the designated senior Accountable Officer with overall responsibility for this Policy and for its regular review.

2.5 The Head of Student Services is the designated Futureworks Prevent Lead. For more information about the responsibilities of the Prevent Lead, please see the Prevent Policy & Procedure.

2.6 The Head of Student Services is the Designated Safeguarding Lead and the Student Welfare Officer is the Deputy Safeguarding Lead.

2.7 The Futureworks Safeguarding Review Panel is responsible for the dissemination and application of this policy and its related procedures, for cases and issues at institutional level and for regular reporting to the Operations Team.

2.8 Key Safeguarding Principles

2.8.1 Futureworks will take all safeguarding concerns seriously and will consider concerns fully and will report any such concerns in a timely manner to the relevant person or body.

2.8.2 Safeguarding referrals to the relevant statutory body will be made on the basis of identified and evaluated risk, as per the procedures outlined below.

2.8.3 Futureworks will ensure it maintains central records of any safeguarding concerns and any referrals made as a consequence.

2.8.4 Futureworks staff working with students and staff who are the subject of safeguarding concerns will consider what support may be offered to the individual and will signpost accordingly. This may include referral to internal and/or external services.

2.8.5 Research carried out with the participation of children or adults at risk must comply with the Futureworks Ethical Practice Policy.

2.9 Record keeping and confidentiality

2.9.1 All records will be kept secure. Only members of the Safeguarding Review Panel will have access to the records.

2.9.2 Records will only be kept as long as necessary, in line with Futureworks Records Retention Schedule.

2.9.3 In cases of disclosure of abuse, Futureworks is obliged to share information in order to address the risk of harm. This may include referral to social services or, in an emergency, the police or NSPCC.

3 Roles and Responsibilities

3.1 Assessing and Responding to the Level of Risk

3.1.1 Futureworks takes all suspicions or allegations of abuse seriously. Futureworks staff know that the needs of the child or adult at risk are of the highest importance. We will always try to act in the best interests of the child or adult at risk, while remembering that the Mental Capacity Act (2005) supports people who lack mental capacity, in decisions which affect them. Where an individual has capacity and is not being pressured, threatened, frightened or bullied, that person has the right to make an unwise decision. We will respond to all allegations that abuse has happened or is likely to happen.

3.1.2 Futureworks may liaise with the local statutory authorities as appropriate. Depending on the nature of the offence, we may defer initiation of our own procedures and investigations until

such time as any external processes, including investigations, court results or legal proceedings, are complete.

3.1.3 Futureworks will secure student's/visitor's consent to share their personal information. However, where consent is not given, staff can still share sensitive personal data if they believe it is in the best interests of the student/visitor, unless to do so would place them at further risk. In all situations where this happens, staff will log and record their decision to share.

3.2 Responsibilities

3.2.1 Futureworks will do whatever is in its power guarantee the safety and protection of people at risk. This Policy is adopted by the Board of Directors and senior management team. They spread the messages in it and work to ensure that all staff adhere to it.

3.2.2 The Board of Directors will:

- Assure that its actions and decisions reinforce the messages contained with the safeguarding policy;
- Have a responsibility to be kept informed and alert to relevant safeguarding risk management issues;
- Be kept informed about any significant safeguarding compliance violations and the outcome of the investigations into their causes; and
- Consider safeguarding implications of all its decisions.

3.2.3 The Operations Team will:

- Implement and promote this Policy;
- Oversee the implementation of safeguarding this Policy;
- Ensure the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and adults at risk;
- Ensure that appropriate and adequate resources are available in order that the institution is able to meet its safeguarding responsibilities; and
- Ensure that appropriate governance staff and bodies are provided with appropriate reassurance that Futureworks is meeting its safeguarding obligations.

3.2.4 The Designated Safeguarding Lead will:

- Implement and promote this Policy;

- Ensure the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and adults at risk;
- Ensure that appropriate and adequate resources are available in order that the institution is able to meet its safeguarding responsibilities;
- Ensure that appropriate governance staff and bodies are provided with appropriate reassurance that Futureworks is meeting its safeguarding obligations; and
- Establish and maintain contact with regulatory and external safeguarding partners.

3.2.5 The Deputy Safeguarding Lead will:

- Assist in implementing and promoting this Policy;
- Work as a substitution for the Designated Safeguarding Lead when necessary, such as annual leave;

3.2.6 Senior/Line Managers will:

- Ensure that staff in their teams understand this Policy and are informed enough to follow it;
- Allow staff to attend safeguarding training and let them access guidance to help them identify abuse and the risk of abuse, and deal with it in the ways set out in this Policy;
- Ensure staff know about, and follow, reporting systems; and
- Plan performance objectives, which support this Policy for staff working in safeguarding roles.

3.2.7 All staff and students will:

- Recognise – Familiarise themselves with the types of abuse and neglect and be vigilant for signs that people may be in need of help or protection;
- Respond – Listen to the person's story and not push for information, showing acceptance of what they are told without making any promises;
- Report – Report what they have seen or been told to the Designated Safeguarding Lead who will, within an appropriate timeframe, either make enquiries without raising the question of abuse and evaluate the matter and/or make a referral to the appropriate statutory authority. Reports can also be made to Line Managers, who

should forward the report to the Designated Safeguarding Lead as quickly as possible; and

- Record – Write down what they have seen or been told, using the words that the person used, including the date, time and place where they received the information.

4 Safeguarding Process

4.1 Safeguarding drop-in sessions

4.1.1 Membership:

- Designated Safeguarding Lead (Head of Student Services)
- Deputy Safeguarding Lead (Student Welfare Officer)
- All student-facing staff

4.1.2 Purpose:

- Provision of guidance and support for member of staffs to enquire about and/or report safeguarding concerns they may have
- Provision of advice and guidance for how to support an individual student
- Opportunity for staff to request training relevant to safeguarding and support
- Improve communication regarding safeguarding processes
- Encourage staff to take on responsibility for safeguarding as a whole-institution approach

4.1.3 Commitments:

- Valuing the needs, views and best interests of those considered to be at risk
- Adopting child - and other relevant protection guidelines through procedures for staff, students and volunteers
- Sharing information about safeguarding good practice with staff
- Sharing information about concerns with staff
- Providing effective management for staff through support and training

4.1.4 Information Sharing:

- Where fitness to study may be an issue, the Programme Leader and/or Vice Principal will be informed and consulted
- Information may be reviewed within the Safeguarding Review Panel if there is a serious concern

4.1.5 Confidentiality:

- Attendees of a Safeguarding drop-in session will refrain from leaving confidential information in the meeting room
- Safeguarding drop-in sessions will only be held in the meeting room where students are not able to enter
- Information submitted to a Safeguarding drop-in session should be verbal only

4.1.6 Case Management:

- If the information received requires additional discussion, it will be reviewed within the Safeguarding Review Panel

4.1.7 Frequency of Meetings:

- Last Thursday of each month

4.2 Safeguarding Review Panel

4.2.1 Membership:

- Designated Safeguarding Lead (Head of Student Services)
- Deputy Safeguarding Lead (Student Welfare Officer)
- Any relevant member of staff required to discuss an individual case or to review a specific support measure
- Any external person required to discuss an individual case or to review a specific support measure

4.2.2 Purpose:

- Discuss any safeguarding referrals from staff and/or students
- Review specific support services to allow us to bring together the various measures of support we offer
- Make decisions on individual safeguarding risks after reviewing:

  - Students currently at risk as recorded via SARD app
  - Referrals (from staff and/or students)
  - Students accessing counselling
  - Financial support applicants
  - Students who have failed to submit work
  - Mitigating Circumstances applicants
  - Criminal conviction declarations
  - Facility resource bans recipients
  - Students who have accessed Studio Support
  - Students who have repeatedly cancelled their Facility bookings
  - Students who have prompted concern via support meetings
  - Applicants with support concerns
- Collate any staff training requested and/or required
- Review Safeguarding Policy
- Review relevant student feedback
- Review any correlation between support measures, trends and/or any specific concerns
- Ensure communication of safeguarding processes and information to staff and students

4.2.3 Commitments:

- Valuing the needs, views and best interests of those considered to be at risk
- Adopting relevant protection guidelines through procedures for staff, students and volunteers
- Sharing information about safeguarding good practice with staff
- Sharing information about concerns with staff
- Providing effective management for staff through support and training

4.2.4 Information Sharing:

- Where fitness to study may be an issue, the Programme Leader and/or Vice Principal will be informed and consulted

4.2.5 Confidentiality:

- Attendees of the Safeguarding Review Panel will refrain from leaving confidential information in the meeting room
- Safeguarding Review Panel members will refrain from leaving confidential information visible on their computer monitors when left unattended
- Safeguarding Review Panel members will refrain from discussing confidential matters in public places
- Information submitted to the Safeguarding Review Panel will be:
    - marked 'confidential'
    - shared electronically, with strict instructions that it is not to be printed
    - be protected via a password/encryption

4.2.6 Case Management:

- If the information received requires additional discussion, it will be reviewed within the Safeguarding Risk Management Review Panel

4.2.7 Specific Policy Responsibilities:

- Safeguarding Policy

4.2.8 Frequency of Meetings:

- First Thursday of each month

4.3 Safeguarding Report

4.3.1 Purpose:

- To record activities during Semester in order to give oversight
- To provide oversight for Senior Management team
- To increase visibility of Safeguarding for Futureworks community

4.3.2 Author:

- Designated Safeguarding Lead (Head of Student Services)

4.3.3 Recipients:

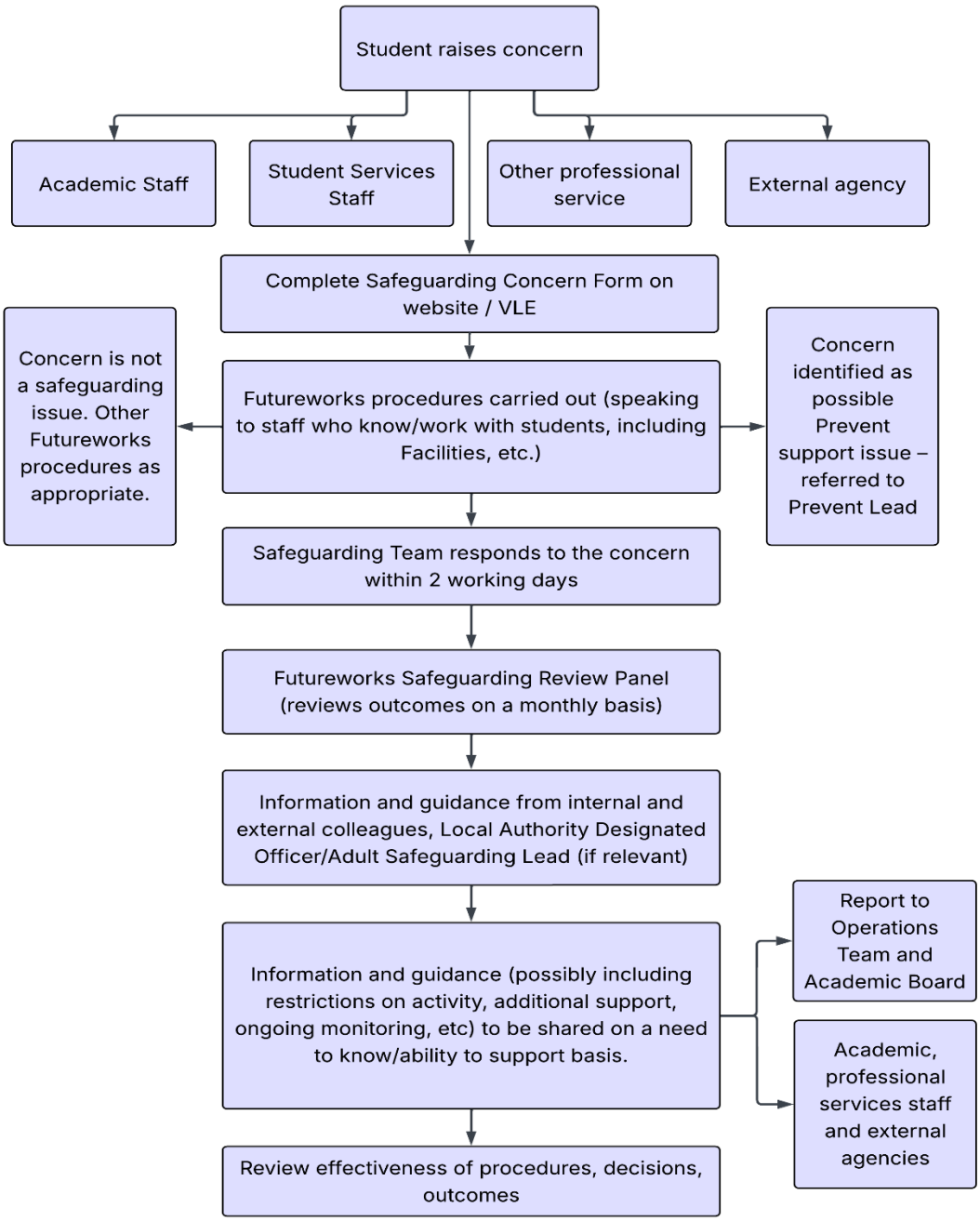
- Academic Board
- Operations Team

4.3.4 Frequency of report:

- Annual

5 Procedure for Reporting Safeguarding concerns

- In the case of an emergency, or when an individual is at immediate risk of harm, you must call the emergency services Tel. 999.



6 Children

6.1 Admissions:

6.1.1 Equality legislation establishes that there is no lower age limit for admission to university.

6.1.2 Futureworks admits students of all ages, who can demonstrate that they are able to benefit from the programme they have chosen to study, and from the social and learning environment which Futureworks provides.

6.1.3 Some students who are admitted to undergraduate programmes reach the age of 18 during their first year of study.

6.1.4 Futureworks will treat all students in the same way and therefore all students, regardless of their age, will be expected to have the necessary skills to study and live independently, and assume an adult level of responsibility.

6.1.5 Academic departments and Student Services are informed of under-age applicants to ensure that safeguarding issues are considered.

6.2 Safeguarding Procedures and Requirements:

6.2.1 However, Futureworks acknowledges that anyone living in England who is under the age of 18 is legally defined as a child, and this document highlights the special arrangements that are in place as a result. Contact is made with parents and carers to make them aware of the remit and boundaries of Futureworks services in relation to students in this category.

6.2.2 Parental Responsibility:

- Futureworks shall not act in “loco parentis”. This means that Futureworks will not act in a parental capacity towards students who are under the age of 18. Students under the age of 18 will not be allowed to register onto their programme of study until they have provided contact information for their parents or guardians.

6.2.3 Health:

- Students, who have not attained the age of 18, can have their refusal to receive medical treatment overridden by parents or guardians. However, please note that a child from the age of 16 is entitled to consent to medical treatment, and that such consent cannot be overruled by parents or guardians. Parents or guardians

are responsible for ensuring that Futureworks has been informed of any special needs or requirements relating to the applicant's health and wellbeing.

6.2.4 Field trips and work placements:

- Different programmes of study may involve compulsory or optional field trips, excursions or other periods of study away from Futureworks. Subject to Futureworks' duties under health and safety law, it is not able to take any additional responsibility for a student who is under the age of 18 years in relation to such activities.
- When arranging work placements/freelance opportunities, Futureworks is obliged to inform any employer that the student is under 18 and ensure that the employer has appropriate insurance and health and safety procedures in place, and that they are aware of the additional responsibilities of employing young people, including any DBS requirements. Futureworks does not guarantee work placements/freelance opportunities.

6.2.5 Alcohol and tobacco:

- It is illegal for alcohol or tobacco to be sold to or bought by students who are under the age of 18 years. Futureworks will take reasonable steps to seek to ensure that the law is not broken on its premises but cannot undertake to supervise any individual student.

6.2.6 Holding office:

- Students who are under 18 years are not allowed to hold office, for example, they may not be secretary or treasurer to a Futureworks club or other students' association.

6.2.7 Relationships with staff:

- Under the Sexual Offences (Amendment) Act 2000, it is a criminal offence for any person in a position of trust (which may include members of Futureworks staff) to engage in sexual activity with someone who is under 18 years.

6.2.8 Child protection:

- As a matter of law in England, a person under the age of 18 is a child. Futureworks will report any suspicions or allegations of abuse of children to the Designated Safeguarding Lead. Any such suspicions or allegations will be reported to the Safeguarding Panel, which will contact the appropriate authorities.

6.2.9 Notification:

- Academic departments will be notified of any student within their School who will be under the age of 18 years upon entry to Futureworks. The personal tutors will also be notified, however teaching and other staff will not routinely be made aware of a student's age.

6.2.10 Parental/Guardian involvement:

- It is Futureworks' usual policy that it deals with students (with whom it has a contractual relationship) and not with parents or guardians. This approach will also apply to students who are under the age of 18.

6.2.11 Internet:

- Parents or guardians of students under 18 should note that internet access is unrestricted at Futureworks. It is not possible for Futureworks to limit access to any particular sites or categories of information. Students under 18 will be expected to observe the same rules and regulations about acceptable use of the Internet as all other students.

6.2.12 Further information and guidance for students, parents and carers is available via:

- Greater Manchester Police: Safeguarding Children: Advice for Family & Friends: https://www.manchestersafeguardingboards.co.uk/children-young-people/cyp-family-friends/
- Department for Education: Safeguarding Children: https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children

7 Adults At Risk

7.1 Students

7.1.1 It is possible that a current student could be/become an adult at risk. In this case, the responsibility for reviewing the fitness to study and safeguarding issues is delegated to the Safeguarding Review Panel. Concerns may be reviewed by the Safeguarding Risk Management Panel if deemed necessary.

7.2 Visitors

7.2.1 Concerns around procedures and practice relating to visitors who are at risk adults will be referred to the Safeguarding Risk Management Panel.

8 Educational and Outreach Activities with Children

8.1 Recruitment and Outreach

8.1.1 Futureworks undertakes a range of activities aimed at raising aspirations of young people to enter higher education and working with prospective students. The majority of these activities involve working with young people under the age of 18.

8.2 Safeguarding Remit:

8.2.1 The Safeguarding Review Panel will ensure that all recruitment and outreach activities are carried out in line with the Futureworks safeguarding policies and guidance.

8.2.2 The Safeguarding Review Panel will provide information and training to ensure that other outreach work is carried out in line with Futureworks safeguarding policies and guidance.

9 Criminal Convictions

9.1 The Principal makes decisions relating to admission of applicants declaring criminal convictions.

9.2 The Principal is advised by a panel that includes:

9.2.1 Head of Student Services;

9.2.2 Student Welfare Officer;

9.2.3 Admissions Officer;

9.2.4 Vice Principal/Programme Leader.

9.3 The Panel will recommend any actions or issues that need to be considered to ensure the safeguarding of the community (and the applicant). This may include reference to external agencies for further guidance.

9.4 Where an applicant can be made an offer and accepts it, the Admissions Officer will liaise with relevant staff, including those in the academic department as appropriate/necessary.

9.5 The Panel will advise relevant colleagues on a need to know/need to support basis.

9.6 For more information see the Futureworks Criminal Convictions Policy.

10 Agency, Contract and Temporary Staff

10.1 Agency workers, contract and temporary staff are obliged, during their time at Futureworks, to adhere to the Futureworks Staff Recruitment and Selection Policy, and will be required to undergo a criminal records check if it is established that the role requires a pre-employment check as set out in the Establishing Whether a Post Requires a Criminal Records Check guidance.

10.2 For agency workers, the recruiting manager is responsible for identifying and communicating with the provider whether any relevant checks are required for a role. It is the agency's responsibility to undertake and notify the recruiting manager of the outcome of the check.

11 Research

11.1 Research projects involving children and adults at risk are subject to the Futureworks Ethical Practice Policy.

12 External Events Hosted by Futureworks

12.1 Safeguarding of Under 18s at Futureworks-Hosted Events

12.2 Conference organisers implement a system of accredited identification for all persons attending a conference where there are groups of under 18's attending. Appropriate adult to under 18s ratios must be maintained to ensure adequate supervision.

12.3 The safety of venues in relation to public access, other users etc. must be considered.

12.4 Futureworks Health and Safety guidance must also be considered.

13 Staff Employment Issues

13.1 Futureworks, as a responsible employer, ensures that it engages staff in a way that is compliant with relevant legislation.

13.2 All vacant positions within Futureworks are reviewed during the recruitment process and a consideration of the risks is undertaken. Where there is the potential for regular unsupervised contact with children and adults at risk then an Enhanced DBS and Barred List check will be undertaken.

13.3 Offers of employment to all posts subject to a DBS check are conditional upon the individual meeting the required standard and failure to do so could result in an immediate withdrawal of the offer of employment.

13.4 Failure to disclose or the provision of a false statement of disclosure by a potential employee may result in disciplinary action with a potential sanction up to and including summary (instant) dismissal.

13.5 All DBS disclosures containing convictions are risk assessed against the job role on an individual basis by the Principal.

13.6 Periodically, when the role of existing member of staff changes, it may be necessary to review the job role and for the existing staff member to undertake a DBS check.

13.7 Staff are contractually obliged to notify Futureworks of any post-employment criminal convictions that may impact upon their future employment with Futureworks. If the individual is found in breach of this contractual obligation then, disciplinary action may be taken with a potential sanction up to and including summary dismissal.

13.8 If a member of staff has suspicions regarding the contact of another employee or individual engaged on Futureworks business with a child/children or an adult at risk then, at the earliest opportunity, they should raise this with the Principal. This is in order that any potential risk can be minimised with immediate effect and to allow an investigation into the allegations to take place.

14 Staff Training

14.1 All Futureworks staff complete mandatory online safeguarding training as part of their onboarding. This is refreshed every year and a record kept. The Head of Student Services also provides training to staff on changes to this and related policies and procedures, as well as developments in the higher education sector in relation to safeguarding.

15 Statutory Agencies and Further Information

15.1 Manchester Social Services: 0161-234-5001, mcsreply@manchester.gov.uk, or https://secure.manchester.gov.uk/info/100010/social_services/3843/tell_us_about_someone_being_abused_or_neglected

15.2 Manchester City Council Help & Support: https://hsm.manchester.gov.uk/kb5/manchester/directory/home.page (to search the directory of support services)

15.3 NSPCC Child Protection Helpline: 0808-800-5000 (if you have concerns or are worried about a child)

15.4 Childline: 0800-1111 (if you are under 19 and are experiencing feelings of stress, anxiety or if you are lonely or down and need someone to talk to)

15.5 What to do if you're worried a child is being abused- advice for practitioners: https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

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

16 Policies

16.1 This Policy needs to be read in conjunction with other policies, including but not limited to:

- Regulations for the Conduct of Students
- Student Social Media Policy
- Data Security Policy
- Equality & Diversity Policy

- Ethical Practice Policy
- Fitness to Study Procedure
- Prevent Policy & Procedure
- Academic Freedom and Freedom of Speech Policy
- External Speaker & Events Code of Practice
- External Speaker Code of Conduct
- Student Harassment & Sexual Misconduct Policy
- Staff & Student Personal Relationships Policy
- Domestic Abuse Policy for Students
- Procedure for Reporting and Responding to Incidents of Harassment, Sexual Misconduct and Domestic Abuse

17 Contacts

17.1 COO: Ben Norris (institutional responsibility for safeguarding and owner of this Policy), 0161-214-4604, ben.norris@futureworks.ac.uk

17.2 Head of Student Services: Leanne Sheridan (Designated Safeguarding Lead, Prevent Lead), 0161-214-4612, leanne.sheridan@futureworks.ac.uk

17.3 Student Welfare Officer (Deputy Safeguarding Lead), 0161-214-4610

18 Appendix 1

18.1 Definitions

18.1.1 What is Abuse?

18.1.2 Abuse and neglect take many forms. Abuse can lead to a violation of someone's human and civil rights by another person or persons.

18.1.3 Abuse can be physical, financial, verbal or psychological. It can be the result of an act or a failure to act. It can happen when an adult at risk is persuaded into a financial or sexual exchange they have not consented to, or cannot consent to.

18.1.4 Abuse can occur in any relationship and may result in significant harm or exploitation.

18.1.5 Some types of abuse are illegal, and in these cases adults who lack capacity are protected by law the same as everyone else. If we suspect that a crime has been committed, we refer the matter to the police.

18.1.6 Sometimes, an urgent referral is made for the safety of the adult at risk and/or to preserve evidence.

18.1.7 Abuse is a misuse of power and control that one person has over another. Where someone is dependent on another, there is the possibility of abuse or neglect unless enough safeguards are put in place. Abuse can fall into the following categories:

- Physical: This includes hitting, slapping, pushing, giving the wrong (or no) medication, restraining someone or only letting them do certain things at certain times.
- Domestic: This includes psychological, physical, sexual, financial or emotional abuse. It also covers so-called 'honour' based violence.
- Sexual: This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the adult didn't consent to or was pressured into consenting.
- Psychological: This includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.
- Financial or material: This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.
- Modern slavery: This covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.

- Discriminatory: This includes types of harassment or insults because of someone's age, disability, sex, race, religion, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity.
- Organisational: This includes neglect and poor care in an institution setting such as a housing associations and halfway houses, or if an organisation provides care in someone's home. The abuse can be a one-off incident or repeated, on-going ill treatment. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes and practices within an organisation.
- Neglect and acts of omission: This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.
- Self-neglect: This covers a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding.
- Forced Marriage: This occurs when someone is pressured into an arranged marriage or forced to marry someone they haven't freely chosen. It can also happen if someone lacks the mental capacity to make their own choices.
- Again, abuse can take many forms. It might not fit comfortably into any of these categories, or it might fit into more than one. Abuse can be carried out by one adult at risk towards another. This is still abuse and should be dealt with. The adult at risk who abuses may also be neglecting him/herself which could also be reason for a safeguarding referral.
- There are some things which might increase the risk of someone being abused, such as:
    - Previous abuse or records of suspected abuse.
    - Other members of the person's family being abused.
    - Family tensions and conflicts.
    - Organic brain injury (lower mental function due to illness).

- Cognitive impairment (someone having trouble with memory, thinking skills or making decisions).
- Physical, mental or emotional dysfunction, especially depression, recently losing a partner, not having friends or a social network, living alone, or not having contact with their children.

18.1.8 Who might be an abuser?

- Children and adults at risk can be abused by a wide range of people – anyone, in fact, who has contact with them. This includes family members, professional staff, paid care workers, other adults at risk, volunteers, other service users, neighbours, friends and associates, people who deliberately take advantage of people who are at risk, strangers and people who see an opportunity to abuse.
- Abuse is always wrong, but it is especially worrying when carried out by someone in a position of power or authority over someone, who uses that power to harm a child or adult at risk.

18.1.9 What are the signs of abuse?

- This list shows some of the signs (there can be others) that abuse might be taking place. If something on this list happens, it doesn't automatically mean someone is being abused – it just means we need to look closer at the situation. Long term effects of abuse and neglect include:
  - Emotional difficulties such as anger, anxiety, sadness or low self-esteem.
  - Mental health problems such as depression, eating disorders, post-traumatic stress disorder (PTSD), self-harm, suicidal thoughts.
  - Problems with drugs or alcohol.

18.1.10 Signs of possible physical abuse include, but are not limited to:

- Any injuries not consistent with the explanation given for them.
- Injuries which occur to the body in places which are not normally exposed to falls or rough games.
- Injuries which have not received medical attention.
- Reluctance to change for, or participate in, games or swimming.

- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation.
- The person gives inconsistent accounts for the cause of injuries.
- Signs that the person is unresponsive to their surroundings while clearly aware of them, i.e. frozen watchfulness.

18.1.11 Signs of possible sexual abuse include, but are not limited to:

- Any allegations made by a person concerning sexual abuse.
- The person has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age or regularly engages in sexual play inappropriate for their age.
- Sexual activity through words, play or drawing.
- Repeated urinary infections or unexplained stomach pains.
- The person is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations.
- Eating disorders such as anorexia or bulimia.

18.1.12 Signs of possible emotional abuse include, but are not limited to:

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a person withdraws or becomes clingy.
- Obsessions or phobias.
- Sudden underachievement or lack of concentration.
- Seeking adult attention and not mixing well with others.
- Sleep or speech disorders.
- Negative statements about self.
- Highly aggressive or cruel to others.
- Extreme shyness or passivity.
- Running away, stealing and lying.

18.1.13 Signs of possible neglect include, but are not limited to:

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice.
- Clothing that is dirty, too big or small, or inappropriate for weather conditions.
- Frequently left alone.
- Frequent diarrhoea.
- Frequent tiredness.
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to.
- Frequently hungry or overeating junk food.

18.1.14 Signs of possible financial abuse include, but are not limited to:

- A change in living conditions.
- Selling possessions.
- Being unable to pay bills, or an unexplained lack of money.
- Money being taken out of an account without a reason.
- Financial documents being lost without a reason.
- Someone being cut off from family, friends or their social network.
- The carer having more money to spend on things like clothes, travel or accommodation.
- Sudden changes to a bank accounts/credit cards and/or how someone uses them.
- New or recent authorised signers on someone's bank/credit cards.
- Money being taken without permission from the person at risk's bank/credit card.
- Changes in how the bank/credit card is being used (such as more frequently or from different locations).
- Sudden or unexpected changes to someone's will or other financial documents.

18.1.15 Signs of organisational abuse include, but are not limited to:

- Social isolation or withdrawal.
- Vague medical complaints such as chronic headaches, fatigue or stomach pain.
- Depression.

19 Appendix 2

19.1 It is a criminal offence for an adult to engage in sexual activity with a young person where the adult is in a position of trust in relation to young people under the age of 18.

19.2 Futureworks recommends that all staff take steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- Always working in an open environment with children;
- Avoiding unnecessary physical contact with children;
- Avoiding inappropriate familiarity with children;
- Always acting upon and recording allegations/reports of abuse made by children;
- Always reporting potential concerns/allegations/reports of abuse made by children to Student Services;
- Not inviting or allowing children to socialise with them and/or to visit them at home; and
- Reporting any potential concerns to their head of department.

20 Appendix 3

20.1 Guidelines for Futureworks Staff Working with Adults at Risk

20.1.1 It may be a criminal offence for an adult to engage in sexual activity with an adult at risk (as defined within this policy) where staff are in a position of trust.

20.1.2 Futureworks recommends that all staff take steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- Always working in an open environment with the adult at risk;
- Avoiding unnecessary physical contact with the adult at risk;
- Avoiding inappropriate familiarity with the adult at risk;
- Always take concerns regarding allegations made against partners (including allegations of domestic abuse), hate crime, allegations against carers and/or institutions seriously;

- Always acting upon and recording allegations/reports of abuse or harm made by the adult at risk;
- Always reporting potential concerns/allegations/reports of abuse made by adults at risk to Student Services;
- Not inviting or allowing the adult at risk to socialise with them and/or to visit them at home;
- Maintaining clear professional boundaries in the use of social media; and
- Reporting any potential concerns to their line manager.

21 Appendix 4

21.1 Establishing Whether a Post Requires a Criminal Records Check

21.1.1 When establishing which posts should be subject to pre-employment criminal records checks, it is vital that due consideration is given to assessing whether or not the post is considered exempt from the Rehabilitation of Offenders Act 1974. This will be the key factor in deciding which level of check, if any, is appropriate. The Safeguarding Vulnerable Groups Act 2006, as amended (in particular, by the Protection of Freedoms Act 2012) also makes provision for the protection of children and adults at risk, stating when criminal record checks are required.

21.1.2 Standard/Enhanced Disclosure checks

- Under the Rehabilitation of Offenders Act 1997, ex-offenders need not provide employers with details of spent criminal records. However, the Exceptions Order to the Rehabilitation of Offenders Act 1974 recognises that there are certain posts for which it will be necessary for the employer to be aware of all spent and unspent criminal records as part of the recruitment process. Exempted occupations are categorised as:
    - work involving contact with vulnerable groups such as the infirm, elderly, mentally ill and young people under the age of 18.
    - professions that have legal protection e.g. nurses, doctors, dentists, chemists, accountants.
    - posts concerned with the administration of justice e.g. police officers, lawyers, probation officer, traffic wardens.

- health service appointments.
- work involving matters of national security e.g. some civil service posts.
- When recruiting to posts which are relevant to these criteria, Futureworks may require a satisfactory Standard or Enhanced Disclosure check as part of the recruitment process.

21.1.3 Basic Check

- There are positions of trust across the institution which may not meet the eligibility criteria for the current Disclosure system, but the responsibilities of the post require some confirmation of unspent criminal record status. The Basic Disclosure will contain details of convictions held in the central police records which are unspent or will state that there are no such records.

21.1.4 Types of Criminal Records Checks

TYPE OF CHECK	REQUIRED FOR	INFORMATION PROVIDED	REQUESTED FROM THE RELEVANT AGENCY	DBS TARGET ISSUE TIME
STANDARD	Posts that involve positions of trust (e.g. legal and accountancy professional roles)	Data on the Police National Computer - includes unspent and spent convictions, plus cautions, reprimands or warnings.	Individual – must be countersigned by a Registered Body through DBS	2 weeks
ENHANCED	Posts which involve working with children or vulnerable adults; also judicial appointments and certain statutory licensing purposes	As for Standard level checks **plus** any additional information held locally by Police forces that is reasonably considered relevant for the post applied for. For posts that involve working with children/adults at risk the appropriate DBS barred list will be checked.	Individual – must be countersigned by a Registered Body through DBS	4 weeks
BASIC	Some positions of responsibility	Information held at national level about unspent convictions on central police records.	Individual through Disclosure Scotland	5 days

21.1.5 Eligibility for Criminal Records Checks Relating to Children

- Staff appointed to carryout work involving the following would require an Enhanced DBS check:
    - Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children;
    - Work for a limited range of establishments ('specified places'), with opportunity for contact: for example, schools, children's homes, childcare premises. Not work by supervised volunteers;
- Relevant personal care, for example washing or dressing; or health care by or supervised by a professional.
- Work under (a) and (b) will only be eligible for a criminal record check if done regularly.

21.1.6 Eligibility for Criminal Records Checks Relating to Adults*

- Staff appointed to carry out work involving the following would require an Enhanced DBS check:
    - Providing health care;
    - Providing personal care;
    - Providing social work;
    - Assistance with cash, bills and/or shopping;
    - Assistance in the conduct of a person's own Services;
    - Conveying.

21.1.7 *Adults are no longer labelled as vulnerable because of their personal characteristics, or the setting in which the activity takes place – the definition identifies activities which, if required, lead them to be considered to be at risk.

22 Appendix 5

22.1 How to respond to a disclosure

22.1.1 In the case of an emergency, or when an individual is at immediate risk of harm, you must call the emergency services Tel. 999.

22.1.2 If a child, young person or adult at risk says or indicates that they are being abused, or information is obtained which gives concern that they are being abused, the person receiving this information should:

- Seek advice from the Designated Safeguarding Lead without delay- this must always be a same day discussion
- Ensure the immediate safety of the person
- If they need immediate medical treatment, call for an ambulance, informing the call centre that that this is a safeguarding issue
- Not promise to keep secrets and remind them of the limits to confidentiality
- React in a calm and considered way so as not to frighten or deter them
- If appropriate, reassure them that they are not to blame for what has happened and that they were right to share this information
- Take what they say seriously, recognising the difficulties inherent in interpreting what is said by a child, young person or adult at risk who has speech disability and/or differences in communication or language
- Keep any questions to the minimum required to clarify the concern and ensure a clear and accurate understanding of what has been said
- Do not ask leading questions or make suggestions about what may have happened
- Listen without interrupting if they are recounting significant events
- Reassure them and tell them what you will do next

22.1.3 The person receiving the disclosure or information should NOT:

- Panic or allow any shock or distaste to show
- Make promises of confidentiality but explain that they will need to pass on this information to those who need to know
- Show disbelief or fail to take the allegations seriously
- Ask questions other than to clarify that they have enough information to act
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Approach the alleged abuser
- Fail to take responsibility for reporting the concern

22.1.4 When reporting the concern:

- Make a note of what was said in the word of the person who disclosed the information. Do not add any judgement, assumptions, own words. This account must be made immediately after disclosure and not in front of the person who has disclosed. Do not take notes when talking to the person who is disclosing this information.

22.1.5 Try to include:

- details of the nature of the allegation or concern
- a description of any injury (you must not remove clothing to inspect any injuries or take photographs)
- any times, dates, places mentioned

22.1.6 Do not worry if you feel you have missed something – refer to the Designated Safeguarding Lead.

22.1.7 If you feel the disclosure is Prevent related, please contact the Prevent Lead.

22.1.8 If you feel the disclosure is support related, please contact the Student Welfare Officer.

22.1.9 Contacts:

Designated Safeguarding Lead and Prevent Lead (Head of Student Services):

Leanne Sheridan

0161 214 4612

leanne.sheridan@futureworks.ac.uk

Deputy Safeguarding Lead (Student Welfare Officer):

0161 214 4610