

Safeguarding, Prevent Policy, and Safer Recruitment

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1. Policy Objectives

- 1.1. This Safeguarding & Prevent Policy (the “Policy”) represents the commitment of Presidency London College (PLC) to safeguarding the welfare and protection of all young people and vulnerable adults, who have contact with PLC on a daily basis.
- 1.2. The objective of this Policy is to prevent and reduce the risk of significant harm to young people and vulnerable adults from abuse or other types of exploitation, including radicalisation, whilst supporting individuals in maintaining control over their lives and in making informed choices without coercion. PLC seeks to achieve these aims by:
 - Outlining PLC’s safeguarding structure;
 - Establishing common procedures that enable young people and vulnerable adults to receive the protection and support they are entitled to;
 - Providing a consistent framework for signposting and making referrals to external support agencies;
 - Recognising and taking action to prevent safeguarding issues, including radicalisation.
 - Defining the responsibilities of PLC and its employees in responding to safeguarding and prevent concerns/allegations;
 - Providing common values, principles and practice that underpin the
 - Protection of young people and vulnerable adults;
 - Defining the different types of abuse, signs, symptoms, and indicators;
 - Setting standards of practice that safeguard young people and vulnerable adults.
- 1.3. PLC is committed to providing an environment where everyone is respected, valued and can feel safe and secure.
- 1.4. PLC seeks to ensure that its Policy and procedures comply with statutory duties, reflects guidance and good practice in safeguarding young people and vulnerable adults, and that safeguarding arrangements are proportionate and appropriate.
- 1.5. PLC is committed to ensuring that young people and adults are given the right support, training and encouragement to realise their true potential and make a valuable contribution to their local community and society generally. All individuals, regardless of age, disability, gender, race, marital status, religion or belief, sexual orientation, pregnancy, or identity have the right to protection from all types of harm and abuse. PLC actively works to ensure that all our employees are given equal access to its services and the support offered, providing an environment that is free from any form of discrimination and one in which safeguarding concerns are appropriately addressed.
- 1.6. PLC promotes this Policy to ensure that the appropriate action can be taken when an individual is suspected by staff of being subject to, or at risk of abuse from parents, carers, any adult, including any employee, or other individuals at work.
- 1.7. PLC acknowledges that members of staff are not specialists in recognising where abuse may occur or has already taken place. PLC expects all staff to adopt and support this Policy to the best of their ability and will support this by providing safeguarding training for staff on the PLC’s procedures for identifying, responding to and reporting abuse and radicalisation. We expect all members of staff to be sensitive and alert to the issue of abuse.
- 1.8. PLC has established links with the FE/HE Regional Prevent Co-ordinator for London and other external agencies to ensure that the safeguarding team and staff are fully apprised of the local risks to learners and to enable the provision of additional or specialist support for employees and learners where appropriate. All members of staff have access to a directory of support agencies on the Dropbox ensuring that they can be signposted and supported appropriately.
- 1.9. PLC has a statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have

“due regard to the need to prevent people from being drawn into terrorism”. The purpose of this policy is to define how PLC and its subcontractors can effectively meet this duty. The Prevent Strategy is part of the Government’s overall counter-terrorism strategy, known as CONTEST. The aim of Prevent specifically is to stop people becoming drawn into terrorism.

1.10. The three specific strategic objectives under Prevent are:

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

(Prevent Duty Guidance in England and Wales; March 2015)

2. Scope of Policy and Responsibilities

2.1 This Policy applies to:

- Learners (apprentices/trainees that are in learning within PLC)
- Employees (individuals who work – or have applied to work for PLC either on a permanent, temporary, or contractual basis); and forms part of any employment or service contract.
- Suppliers (external partners who provide training or employability services on our behalf);
- External stakeholders and visitors

The contents of this Policy are to be regarded by any person as implied, collateral or express terms to any employment or service contract made with PLC.

2.2 Any employee who does not comply with this Policy may face disciplinary action which, depending on the severity of the breach, may result in dismissal from PLC. It is the responsibility of all employees to ensure they are familiar with the contents of this Policy and follow the procedures and guidelines laid out herein.

2.3 PLC believes that everyone has a moral responsibility to safeguard and promote everyone’s welfare and protection from abuse or radicalisation/extremism.

2.4 PLC believes that safeguarding is everybody’s business, with employees playing a key role in preventing, identifying, and reporting safeguarding and Prevent Duty issues. PLC’s role in safeguarding is to provide the vision, direction and ensure that the legal and procedural framework, including powers and duties, is clear, and proportionate, whilst ensuring operational flexibility. This framework will be sufficient to enable employees to take appropriate and timely safeguarding action.

2.5 PLC recognises that it has a duty to help employees, and learners recognise their responsibilities (through guidance, support and training), understand changes in behaviour, minimise risk and avoid situations (where possible) where abuse or neglect might be alleged or where it is thought a vulnerable individual may be being groomed.

2.6 It is not the responsibility of PLC to decide whether abuse or radicalisation has taken place. PLC has a responsibility to act if there is cause for concern, in order that the appropriate agencies can investigate and take any necessary action to protect an individual.

2.7 PLC has a strategy to ensure staff awareness and continuous updating on legislation in relation to this and monitoring arrangements to ensure the effectiveness of our Safeguarding and Prevent Policy and procedures.

2.8 PLC reserves the right to amend and update this Policy at any time.

3. Key Safeguarding Principles

3.1 The key principles set out below are integral to this Policy and can be used to measure existing safeguarding arrangements and to measure future improvements. The principles are not in order of priority; they are all of equal importance but with an emphasis on the importance of prevention and ensuring proportionate responses:

- **Empowerment** – presumption of person-led decisions and informed consent. We give individuals the right information about how to recognise abuse or radicalisation and what they can do to keep themselves safe. We give them clear and straightforward information about how to report causes for concern, abuse, and crime and what support we can give. We consult them before we take any action. Where someone lacks capacity to make a decision, we always aim to act in his or her best interests. Prevention – it is better to take action before harm occurs. We help identify and report signs of radicalisation and extremism, abuse, and suspected criminal offences. We inform staff how to recognise signs and take action to prevent abuse occurring. In all our work, we consider how to make people safer.
- **Proportionality** – proportionate and least intrusive response appropriate to the risk presented. We discuss with the individual and, where appropriate, with partner agencies what to do where there is risk of significant harm before we take a decision. Risk is an element of many situations and should be part of any wider assessment.
- **Protection** – support and representation for those in greatest need. We have effective ways of assessing and managing risk. Our complaints and reporting arrangements for abuse and suspected criminal offences operate effectively.
- **Partnership** – local solutions through services working with communities. We encourage sharing information locally. We have multi-agency partnership arrangements in place and staff are trained to understand how to use these. We foster a “one” team approach that places the welfare of individuals before the “needs” of the system.
- **Accountability** -accountability and transparency in delivering safeguarding. The roles of all employees are clear, together with the lines of accountability. Staff are trained to understand what is expected of them and others, and recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.

4. Prevention

4.1 Whilst Safeguarding procedures focus on responding to incidents of abuse and radicalisation, it's prevention must always be the primary objective. PLC and its employees have a role in preventing abuse and radicalisation.

4.2 PLC and its employees can help prevent abuse and radicalisation, by encouraging people they are concerned about to recognise risks, to seek support and to access services they need. This might be by helping people to access information and advice or to understand their rights and responsibilities.

4.3 Prevention is associated with a broad range of responsibilities and initiatives; each associated with making Safeguarding a core responsibility when providing services. To support best practice in prevention, PLC has incorporated Safeguarding and Prevent as strategic objectives at the heart of practice and delivery at every level of PLC. The framework of leadership and accountability ensures that safeguarding systems are in place.

4.4 Prevention involves a safe and appropriately skilled workforce where practice is consistent- there

is good communication between members of staff. PLC employees have the skills, experience and aptitude to work with particular groups and all employees have read and understood PLC's Safeguarding and Prevent Policy.

- 4.5 PLC encourages prevention through a safeguarding culture where employees and learners are our primary concern. Our employees are attuned to risks of neglect, harm, abuse, radicalisation and understand their roles and responsibilities around safeguarding.

5. What is Safeguarding?

- 5.1 Safeguarding is the term that describes the function of protecting adults and young people from abuse or neglect. It is an important shared priority and a key responsibility of PLC and its employees.

- 5.2 Safeguarding relates to the need to protect certain people who may be in vulnerable circumstances. These are people who may be at risk of abuse or neglect, due to the actions (or lack of action) of another person. In these cases, it is critical that we work together to identify people at risk and put in place interventions to help prevent abuse or neglect, and to protect people.

6. Young Person

- 6.1. A young person is defined as anyone who has not yet reached their 18th birthday. For individuals with learning disabilities we also include those who are 18 years old.

- 6.2. Safeguarding and promoting the welfare of young people is defined for the purposes of this Policy as:

- protecting young people from maltreatment;
- preventing impairment of young people's health or development;
- ensuring that young people grow up in circumstances consistent with the provision of safe and effective care;
- and taking action to enable all young people to have the best outcomes.

- 6.3. This Policy aims to help employees understand what they need to do, and what they can expect of one another, to safeguard young people. It focuses on core legal requirements and it makes clear what PLC and its employees should do to keep young people safe. In doing so, it seeks to emphasise that effective safeguarding systems are those where:

- The young person's needs are paramount, and the needs and wishes of each young person should be put first, so that every young person receives the support they need before a problem escalates;
- All employees who come into contact with young people and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to young people;
- PLC, where necessary, shares appropriate information with external agencies in a timely way and can discuss any concerns about an individual young person;
- all employees contribute to whatever actions are needed to safeguard and promote a young person's welfare.

7. Vulnerable Adult

7.1. A vulnerable adult is a person of 18 years or older 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 risk of, or the experience of abuse or neglect.

7.2. A vulnerable adult *may* therefore be a person who is, for example:

- Living in sheltered housing;
- Receiving any form of health care;
- Receiving a welfare service in order to support their need to live independently;
- Receiving a service due to their age or disability;
- Living in residential accommodation such as a care home;
- Receiving domiciliary care in their own home;
- Expectant or nursing mother living in residential care; and
- Person under supervision of probation service

This list is not exhaustive.

While the definitions of a vulnerable adult give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, such as:

- Poor numeracy and literacy skill, or specific learning need;
- Unsupportive home environment;
- English not a first language;
- Unsupportive employer;
- Under represented group;
- Acting as a carer for another family member;
- Background in offending; and
 - Disability or social need

8. What is abuse?

Abuse is the improper usage or treatment of a thing, often to unfairly or improperly gain benefit. Abuse can come in many forms, such as: physical or verbal maltreatment, injury, assault, violation, rape, unjust practices, crimes, or other types of aggression.

- 8.1. Abuse and neglect are forms of maltreatment; it can be due to an individual inflicting harm or failing to prevent harm.
- 8.2. An individual may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another young person or people.
- 8.3. Harm is the term used to justify intervention within the safeguarding procedures.

9. Types of Abuse

9.1. There are six types of abuse for young people, as defined by the Keeping Children Safe in Education Statutory Guidance September 2018

Abuse, physical, emotional, sexual, neglect

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by

inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs
- **Gaslighting:** A form of intimidation or psychological abuse, sometimes called Ambient Abuse where false information is presented to the victim, making them doubt their own memory, perception and quite often, their sanity. The classic example of gaslighting is to switch something around on someone that you know they're sure to notice, but then deny knowing anything about it, and to explain that they "must be imagining things" when they challenge these changes.

9.2. There are Eleven types of abuse identified for adults, as defined by the Care and Support

Physical, Domestic Violence, Sexual, Psychological, Financial, Modern Slavery, Discriminatory, Organisational, Neglect, Self-neglect

- **Physical abuse** – may involve hitting, slapping, pushing, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, misuse of medication, restraint, or inappropriate sanctions or otherwise causing physical harm to an individual;
- **Domestic Violence** – any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. Witnessing domestic abuse is child abuse, and teenagers can suffer abuse in their relationships.
- **Sexual abuse** – involves forcing or enticing a child, young person or adult to take part in sexual activities, whether or not they are aware of what is happening. This may include ‘rape and sexual assault or sexual acts to which the individual has not consented or could not consent or was pressured into consenting’. Sexual abuse also includes forcing a person to look at pornographic materials;
- **Emotional (Psychological) abuse** – the persistent emotional ill treatment of an individual such as to cause severe and persistent adverse effects on the individual’s emotional development and well-being. This may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks;
- **Financial or material abuse** – may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;
- **Trafficking (Modern Slavery)** – “Trafficking of persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. This could be the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. A full policy can be found on PLC’s website www.presidencylondoncollege.ac.uk
- **Discriminatory abuse** – may include abuse, bullying or harassment based for example on an individual’s age, sex, disability, religion, race or ethnicity or sexual orientation. PLC will endeavour to identify and deter any form of discriminatory behaviour. Bullying and harassment can escalate rapidly and can damage individuals significantly.
- **Organisational/institutional abuse** – Informal settings’ institutional abuse can occur when staff are inadequately trained or poorly supervised or if they are not managed or resourced properly. Often too, there may be ‘closed culture’ where input from the outside is strongly resisted and where there is very little transparency within the organisation. Institutional abuse can also be much ‘closer to home in that it is simply the mistreatment of children or Vulnerable adults by any system of power.
- **Gaslighting:** A form of intimidation or psychological abuse, sometimes called Ambient Abuse where false information is presented to the victim, making them doubt their own memory, perception and quite often, their sanity. The classic example of gaslighting is to switch

something around on someone that you know they're sure to notice, but then deny knowing anything about it, and to explain that they "must be imagining things" when they challenge these changes.

- **Neglect and acts of omission** – Definition of neglect: The failure of any person, who has responsibility for the charge, care or custody of an adult at risk, to provide the amount and type of care that a reasonable person would be expected to provide. Neglect can be intentional or unintentional.

Neglect and Acts of Omission includes:

- Ignoring medical, emotional or physical care needs
- Failure to provide access to appropriate health, care and support or educational services
- The withholding of the necessities of life, such as medication, adequate nutrition and heating.

Other potential indicators of Neglect and Acts of Omission:

- Poor environmental conditions
- Inadequate heating and lighting
- Poor physical condition of the vulnerable adult
- Clothing is ill-fitting, unclean and in poor condition
- Malnutrition
- Failure to give prescribed medication properly
- Failure to provide appropriate privacy and dignity
- Inconsistent or reluctant contact with health and social care agencies
- Isolation – denying access to callers or visitors

- **Self-neglect** – is the lack of self-care to an extent that it threatens personal health and safety. This covers a wide range of behaviour neglecting one's personal hygiene, health or surroundings and includes behaviour such as hoarding. An assessment should be made on a case by case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

9.3. Other forms of abuse include: -

- **Child sexual exploitation (CSE)** – exploitative situations, contexts and relationships where young people receive something as a result of engaging in sexual activities. Sexual exploitation can take many forms, ranging from the seemingly "consensual" relationship where sex is exchanged for affection or gifts to serious crime by gangs and groups.
- **Cyberbullying** – this can be done via text messages or the internet (social media sites) and is usually prejudged against particular groups. It can result in the intimidation of a person through the threat of violence or by isolating them either physically or on-line.
- **Drugs** – this could relate to alcohol, tobacco, illegal drugs, medicines, new psychoactive substances (legal highs) and volatile substances.
- **Fabricated or induced illness** – there are 3 ways in which the carer of a child will fabricate or induce an illness in a child: -
 - Fabrication of signs and symptoms – fabricating a past medical history;
 - Fabrication of signs and symptoms and falsifying hospital charts and records, including letters and documents;

- Induction of illness by a variety of means.
- **Faith Abuse** – this includes belief in concepts such as witchcraft and spirit possession, demons or the devil, acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eyes or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children making them more compliant when they are being trafficked for domestic slavery or sexual exploitation.
- **Forced Marriage** – is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities cannot) consent to the marriage and duress is involved.
- **Gangs and Youth Violence** – “Street gangs” for whom crime and violence are a core part of their identity, although “delinquent peer groups” can also lead to increased antisocial behaviour and youth offending. Although some group gatherings can lead to increased antisocial behaviour, it should not be confused with the serious violence of a gang culture/activity.
- **Private Fostering** – a private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 by someone other than a parent or close relative with the intention that it should last for 28 days or more.
- **Female Genital Mutilation (FGM)** – FGM comprises all procedures involving the partial or total removal of the female external genitals or other injury to the female genital organs for non-medical reasons. This can range from a symbolic prick to the vagina to a fairly extensive removal and narrowing of the vagina opening and in the UK all forms are prevalent. It can be known as “female genital cutting” or “female circumcision” and some communities tend to use local names for referring to this practice including “sunna”.
- **Gender based violence/violence against women and girls (VAWG)** – refers to violence, physical, sexual or otherwise, stalking and harassment and female genital mutilation.
- **Sexting** – “Sexting” is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet. Young people may also call it cybersex or send a “nude” picture or selfie of themselves partially clothed.
- **Teenage Relationship Abuse** – can be emotional, physical, sexual or financial abuse, where teenagers are isolated from their friends, being controlled with what they wear, checking up on them all the time, being forced to have sex, being forced to watch pornography against their will, forcing others to buy them things.
- **Mental Health** – good or positive mental health is more than the absence or management of mental health problems; it is the foundation for wellbeing and effective functioning for wellbeing and effective functioning both for individuals and for their communities.
- **Honour Based Violence** - Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture.

- **Breast Ironing** - refers to the practice of massaging or pounding young girls' breasts with heated objects to suppress or reverse the growth of breasts. Breast ironing is often performed by mothers or female relatives of victims misguidedly wishing to protect their young relatives from rape, unwanted sexual advances, early sex, and pregnancies, all of which they fear would result from the appearance that a girl has reached the age of puberty.
- **Radicalisation** - Radicalisation is defined by the UK Government within this context as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups."

10. Signs and Patterns of Abuse

10.1. The most likely ways that a suspicion or concern will be raised is by:

- An individual "disclosing" abuse;
- Bruising or evidence of physical hurt; which may or may not be accompanied by a change in behaviour;
- The conduct of a member of staff or another individual.

10.2. Patterns of abuse and abusing vary and reflect very different dynamics. These include:

- serial abusing in which the perpetrator seeks out and 'grooms' vulnerable individuals. Sexual abuse usually falls into this pattern as do forms of financial abuse and radicalisation;
- long-term abuse in the context of an on-going family relationship such as domestic violence;
- opportunistic abuse such as theft;
- situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour;
- neglect of a person's needs because those around him or her are not able to be responsible for their care, for example, if the carer has difficulties attributable to such issues as debt, alcohol or mental health problems;
- institutional abuse which features poor care standards, lack of positive responses to complex needs, rigid routines, inadequate staffing and insufficient knowledge base within the provider or service;
- unacceptable 'treatments' or programmes with sanctions or punishments such as withholding food and drink, seclusion, unnecessary and unauthorised use of control and restraint, or over-medication;
- failure to ensure staff receive appropriate guidance on anti-racist and anti-discriminatory practice;
- failure to access key services such as health care and dentistry;
- misappropriation of benefits and/or use of the person's money by other members of the household;
 - fraud or intimidation in connection with wills property or other assets.

10.3. Rules of protection:

- Recognise – be familiar with signs and indicators, have a listening culture, be vigilant.
- Respond – be sensitive and empathetic, ask direct questions, do not promise to keep anything

to yourself.

- Record – know Young’s recording process, know what to record and where, know where to send information and how.
- Report – know who to report to internally, know how to get hold of them
- Refer – this is the role of the Designated Safeguarding Officer (DSO) others should only contact authorities if there is an emergency or immediate danger.

11. The Prevent Duty

- 11.1. Section 26 of the Counter-Terrorism and Security Act 2015 (‘CTSA Act’) places a duty on the PLC, in the exercise of its functions, to have *“due regard to the need to prevent people from being drawn into terrorism”*. This is known as the Prevent Duty.
- 11.2. The term *“due regard”* is used in the CTSA Act means that PLC should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when it considers all the other factors relevant to how it carries out its usual functions and activities.
- 11.3. Terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them.
- 11.4. The Government has defined extremism as *“vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces.”*
- 11.5. The most significant and publicised threat is currently Islamic State and associated groups. However, there are wider groups outside of this such as those associated with the Far Right. The Prevent Strategy is concerned with non-violent extremist groups as these can create an atmosphere in which terrorist ideology can grow.
- 11.6. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances. However, there are a number of signs and indicators that an individual could be being drawn in:
 - isolating themselves from family and friends
 - talking as if from a scripted speech
 - unwillingness or inability to discuss their views
 - a sudden disrespectful attitude towards others
 - increased levels of anger
 - increased secretiveness, especially around internet use
- 11.7. The Prevent Strategy deals with all forms of terrorism and with non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. It also made clear that preventing people becoming terrorists or supporting terrorism requires challenge to extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups. The strategy also means intervening to stop people moving from extremist (albeit legal) groups into terrorist- related activity.
- 11.8. PLC has implemented its Prevent-related responsibilities in a proportionate and risk-based way. All employees should demonstrate an awareness and understanding of the risk of radicalisation. The risk will vary greatly and can change rapidly; but no area, institution or body

is risk free. The Prevent Duty is not about preventing individuals from having political and religious views and concerns, but about supporting our employees and learners to use those concerns or act on them in a non-extremist way.

- 11.9. Prevent is an important element within our Safeguarding Policy and processes. Prevent is focused on safeguarding employees, learners and encourages a learning environment where issues can be raised and discussed safely.
- 11.10. All employees drive our Prevent strategy led by our Prevent Officer and senior management by:
- Ensuring all staff, including CEO and Senior Managers, receive awareness training on Prevent
 - Providing training to ensure staff understand their Safeguarding responsibilities and processes and policy to outline how to make a referral to the Channel team
 - Providing staff training and guidance on how to recognise potential signs that an employee may be becoming involved with extremist organisations
 - Creating a single point of contact for Prevent and Safeguarding related issues
 - Maintaining links with the local Prevent Coordinators
 - Ensuring British Values are promoted and are embedded with PLC's delivery and day to day activities
 - Maintaining IT policies that are robust and can deal effectively with potential online risks from extremist organisations, through appropriate use of firewalls and monitoring usage
 - Ensuring our rigorous risk assessment process is in place and utilised which ensures Prevent is fully considered, including visitors and external speakers
 - Ensuring our subcontract providers have appropriate policies in place to meet their duties under Prevent
- 11.11. Prevent work depends on effective partnership. PLC maintains productive co-operation with Prevent Co-ordinators, local authorities, multi-agency forums and relevant stakeholders.
- 11.12. Employees have a responsibility to understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. In particular, all employees should be aware of the following terms and the relationship between extremism and terrorism:
- **'Having due regard'** – means that we should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when we consider all the other factors relevant to how we carry out our functions.
 - **'Extremism'** – defined in the Prevent Strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas.
 - **'Interventions'** – are projects intended to divert people who are drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).
 - **'Non-violent extremism'** – is extremism, as defined above, which is not accompanied by violence.
 - **'Prevention'** – means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to

divert vulnerable people from radicalisation.

- **'Radicalisation'** – refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **'Safeguarding'** – is the process of protecting vulnerable people, whether from crime, other forms of abuse or (in this context) from being drawn into terrorist-related activity.
- **'Terrorism'**– as defined by the Terrorism Act 2000, is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- **'Terrorist -related offences'**– are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.
- **'Vulnerability'** – describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within prevent the word describes factors and characteristics associated with being susceptible to radicalisation.

11.13. The Prevent Duty does not and must not involve any covert activity against people or communities. PLC may however need to share personal information to ensure, for example, that a person at risk of radicalisation is given the appropriate support. Information sharing is assessed on a case-by-case basis and is governed by legislation and the following principles:

- Necessity and Proportionality – personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgment of the risks to an individual or the public;
- Consent – wherever appropriate the consent of the person concerned should be obtained before sharing any information about them;
- Data protection – personal data may be shared in order to:
 - comply with PLC's legal obligations;
 - protect the vital interests of a data subject or of another person; and
 - perform a task carried out in the public interest or in the exercise of official authority vested in PLC.

All meanings, such as “personal data” and “data subject” have the same meaning as set out in the General Data Protection Regulation (2016/679 (EU) of the European Parliament).

- Confidentiality – PLC should be aware of any confidentiality obligations that exist.

12. Modern Day Slavery

Modern day slavery is present in every area of the uk. You probably see people trapped in slavery on a regular basis. It might be someone working in a private home on your street, the man working in the car wash in town, or cleaner to empties your office bin every night.

For full policy visit the college's website at www.presidencylondoncollege.ac.uk

13. British Values

13.1. PLC actively promotes the fundamental British values of:

- **Democracy** – an understanding of how citizens can influence decision- making through the democratic process;
- **The rule of law** – an appreciation that living under the rule of law protects individual citizens and is essential for wellbeing and safety;
- **Individual liberty** – an understanding that the freedom to choose and hold other faiths and beliefs is protected in law;
- **Mutual respect** – an acceptance that other people having different faiths or beliefs (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour;
- **Tolerance of those with different faiths and beliefs** – an understanding of the importance of identifying and combatting discrimination.

13.2. Actively promoting these values means challenging opinions or behaviours that are contrary to fundamental British values. Employees should not promote, or tolerate to be promoted, views or theories as fact which are contrary to established scientific or historical evidence and explanation. The aim is to improve safeguarding and standards of spiritual, moral, social and cultural development, and to strengthen barriers to extremism.

13.3. The British Values and Prevent duty relate to the Equality Act 2010 as we seek to:

- Eliminate unlawful discrimination, harassment, or victimisation;
- Advance equality of opportunity between people who share a protected characteristic, and those who do not;
- Foster good relations between people who share a protected characteristic and those who do not.

14. Reporting Procedure for Safeguarding and Prevent

14.1. Remember – safeguarding is the term that describes the function of protecting vulnerable adults and young people from abuse, neglect and radicalisation. All suspicions or allegations will be taken seriously. Employees should be aware that the needs of the vulnerable adult or young person at risk are paramount and must always act in the best interests of the vulnerable adult or young person at risk. If in doubt a referral to the Designated Safeguarding Person (DSP) must be made.

14.2. If anyone makes a Safeguarding disclosure about an employee of PLC, this must be referred immediately to a Designated Safeguarding Person without delay. Any instances involving staff will be dealt with through the relevant PLC policies and procedures.

14.3. If anyone makes a disclosure to any member of staff highlighting a safeguarding issue – i.e. a suspicion of abuse or neglect – or there is a reasonable belief of a safeguarding issue, it should be reported immediately, in the first instance, to the line manager. **It is imperative that under no circumstances should any staff member agree to keep a disclosure confidential.**

14.4. The line manager will assess the situation and, if the line manager considers that there has been or is reasonably likely to be an incident of abuse or neglect, will report the matter to the

DSP using the Safeguarding Cause for Concern Form.

14.5. When assessing any (potential) safeguarding issue, the criteria to be used are as follows:

- what the actual risks are – the likelihood and seriousness of an incident occurring (or reoccurring);
- the views of the adult or child at risk in relation to the risk of harm;
- the person's ability to protect themselves;
- the factors that increase or reduce the risk of harm.

14.6. When referring a Safeguarding matter to the Designated Single Point of Contact, the line manager must ensure they have the details of the concern and email these immediately to the Safeguarding Designated Single Point of Contact email addresses safeguarding@presidencyondoncollege.ac.uk as appropriate, followed by a telephone call to confirm receipt and discuss the matter – using the details in *Section 15 Designated Persons and Single Point of Contact*

14.7. The Designated Person will then review the concern and assess (see 13.5) whether the matter needs to be referred on to an appropriate agency or authority, or if support is required where it is not deemed to be a safeguarding concern.

14.8. If an incident of abuse may be considered to be a criminal offence, then the matter will be referred to the Police immediately. Examples of when action may be considered a criminal offence include: assault, whether physical or psychological, sexual assault and rape, theft, fraud or other forms of financial exploitation, and certain forms of discrimination, whether on racial or gender grounds.

14.9. Other incidents of abuse will be reported by the Designated Person to Adult Social Services, the Local Safeguarding Children Boards (LSCBs) and/or Local Authority Designated Officer (LADO) as appropriate. The Designated Person will complete the Safeguarding Risk Assessment Form and file securely. The Designated Safeguarding Person will work with Multi Agency Safeguarding Hubs (MASH) - London councils teams; the Police, Samaritans and Channel as appropriate.

15. Prevent Communication Process

Concern raised about employee welfare in terms of potential risk of radicalisation:

- Immediately discuss concerns with line manager or one of designated members of staff, contact details as indicated in *Section 15 Designated Persons and Single Point of Contact*.
- Record in as much detail as possible, the details of the concern and email these as soon as practicable after the concern is raised to the Single Point of Contact email address of safeguarding@presidencyondoncollege.ac.uk
- Once reviewed, the designated person may feel that no further safeguarding action should be taken, however it may be appropriate to offer the employee some ongoing support.
- If the reason for the concern continues then the designated member of staff refers to local Prevent Coordinator following up in writing within 48 hours.
- Prevent Coordinator acknowledges receipt of referral and decides on next course of action. Note: PLC may be asked to participate with a multi-agency approach under Channel but will be guided by Prevent team.

16. Designated Persons and Single Point of Contact

- 16.1. PLC has designated persons who are ultimately responsible for all safeguarding issues within PLC, as listed below, to whom queries can be made.
- 16.2. **All reporting of incidents/occurrences must be sent to the Single Point of Contact email address safeguarding@presidencylondoncollege.ac.uk as appropriate.** All designated persons receive emails sent to the Single Point of Contact email address.

Designated Safeguarding / Prevent Persons:

Name	Position	Role	Contact details
Razaq Mohammed	Chief Executive Officer	DSP	E: ceo@presidencylondoncollege.ac.uk Contact: 07738 621 321
Faiz Ahmed	Administration and Office Manager	DSO	E: Faiz@presidencylondoncollege.ac.uk Contact:
Prevent Officer			
Ray Mo	Liaison and Employment Officer	DSO	E: ray@presidencylondoncollege.ac.uk Contact:
External referral for all Safeguarding and Prevent details			
Jenni Fisher	FE/HE Regional Prevent Co-Ordinator for London	Coordinates Prevent for London	E: Jennie.FISHER@education.gov.uk Contact: 07880 469 588
Patricia McMahon	Business Manager / Safeguarding Adult Executive Board		E: patricia.mcmahon@rbkc.gov.uk

NB: The Chief Executive Officer, Razaq Mohammed, also acts as a Designated Person; however, all Safeguarding matters are dealt with foremost by the Lead Designated Person (LDP).

- 16.3. The role of the LDP is to take lead responsibility for managing safeguarding and prevent issues. This involves providing advice and support to other staff, making referrals to, and liaising with, the local authority and working with other agencies. The LDP is a member of the Senior Management Team and takes responsibility for PLC's safeguarding practice, policy, procedures and professional development.
- 16.4. The LDP receives all referrals and reports. The Designated Person is ultimately responsible for deciding action to be taken and retains all documentary safeguarding reports.

17. Safeguarding Information and Data

- 17.1. PLC will manage its employees' information in line with its Privacy Notice. PLC is registered under the Data Protection. Certificate is displayed on the office noticeboard.
- 17.2. PLC is not prevented from carrying out effective vetting controls, but this will be balanced between the employer's needs and the applicant's right to respect for his or her private life. The important considerations are (i) that checks are carried out uniformly on a non-discriminatory basis and (ii) that privacy rights, where relevant, are respected.
- 17.3. All relevant documentation will be kept securely locked and a clear desk Policy must be in place at all times by those involved in handling personal information. Any documents that contain personal data and require disposal should be securely shredded, and any related documents that need to be emailed must be sent to the single point of contact email address which has restricted access limited to the safeguarding lead and co-ordinators only.

- 17.4. When Safeguarding young people or vulnerable adults, there may be a need to disclose personal or sensitive information to someone from another organisation. PLC will only do this where the law permits, and where disclosure is considered to be in the best interests (safeguarding) of the person, including the prevention of a crime and on a need to know basis.
- 17.5. Wherever abuse is alleged or suspected, PLC will seek to share information between relevant professionals in exploring how to protect the individual concerned or others. People who are subject to abuse or allegations of abuse and their families have a right to expect that confidences will be respected, and their privacy protected. But where their “vital interests”¹ (that is questions of life or death), “best interests”, or the public interest are involved, establishing the facts through information sharing takes precedence.
- 17.6. Information can be shared in certain circumstances with other people or agencies in compliance with data protection laws, regulations and best practice guidance. Data can be shared with third parties “in the vital interest of the data subject”, “in the public interest” (e.g. in the interest of the client or others in the same setting) or to comply with PLC’s legal obligations. Examples of when this may be appropriate will be if there is a need to seek information from another agency, or there is a potential risk to others from the alleged abuser. Any information relating to the accusation/suspicion of abuse should and can be shared with the Social Services department or Police investigating the case
- 17.7. If personal or sensitive information is to be shared, this will be done (where appropriate) with the person’s agreement. In the absence of such, assessment of their vital interests may still justify further enquiries, while questions involving the public interest may justify overriding their views. Where adults lack capacity to safeguard themselves, others will need to make decisions for them in accordance with the Code of Practice and in the person’s best interests. The rights of “whistle-blowers” and of alleged perpetrators of abuse will also be respected.
- 17.8. Information shared will always be on a “need to know” basis, i.e. such which is necessary to achieve the objective of safeguarding adults and children at risk. Care will be taken to ensure the quality of the information shared, e.g. names, addresses and dates of birth are accurately recorded.

17. Employee training in Safeguarding and Prevent

- 17.1. PLC is committed to have arrangements in place to ensure effective training of all employees.
- 17.2. PLC expects all team members involved in the Apprenticeship and Traineeship programme to be trained in Safeguarding and Prevent to a minimum of level 1, with further levels of training to be determined by the responsibilities set out in role functions.
- 17.3. Any employee who works on the Apprenticeship and/or Traineeship programme is to complete Safeguarding and Prevent training within 3 months of employment or the apprentice start date (as applicable).
- 17.4. The safeguarding team will report identified training needs of employees to managers with responsibility for the employee’s training and offer opportunity to undertake appropriate Safeguarding and Prevent training as deemed necessary.

Appendix 1 – Supplementary guidance on safeguarding and prevent issues

Department for Education guidance

Safeguarding children who may have been trafficked

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

Safeguarding children and young people affected by gang activity

<https://www.gov.uk/government/publications/safeguarding-children-and-young-people-who-may-be-affected-by-gang-activity>

Multi-agency statutory guidance on female genital mutilation

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Forced marriage

<https://www.gov.uk/guidance/forced-marriage>

Child abuse linked to faith or belief: national action plan

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

Safeguarding children and young people from sexual exploitation

<https://www.gov.uk/government/publications/safeguarding-children-and-young-people-from-sexual-exploitation-supplementary-guidance>

Safeguarding children in whom illness is fabricated or induced

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Preventing and tackling bullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Keeping children safe in education

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

Information sharing advice for safeguarding practitioners

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Safeguarding disabled children

<https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>

National service framework: children, young people and maternity services

<https://www.gov.uk/government/publications/national-service-framework-children-young-people-and-maternity-services>

Child abuse concerns: guide for practitioners

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Guidance issued by other government departments and agencies

Forced marriage

<https://www.gov.uk/guidance/forced-marriage>

Stop forced marriage

<https://www.gov.uk/stop-forced-marriage>

Violence against women and girls

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

Working together to safeguard children

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf

NHS National Treatment Agency: Guidance on development of Local Protocols between drug and Alcohol Treatment Services and Local Safeguarding and Family Services

<http://www.nta.nhs.uk/uploads/supportinginformation.pdf>

Disclosure & Barring Service

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Ministry of Justice: Multi Agency Public Protection Arrangements guidance

<http://www.justice.gov.uk/downloads/offenders/mappa/mappa-guidance-2012-part1.pdf>

Prison, probation and rehabilitation: Public Protection Manual

<https://www.gov.uk/government/collections/prison-probation-and-rehabilitation-public-protection-manual>

Ministry of Justice: Probation service guidance on conducting serious further offence

<http://www.justice.gov.uk/downloads/offenders/probation-instructions/pi-10-2011-review-further-offences.doc>

Missing Children and Adults strategy

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

Recognised, Valued and Supported: next steps for the carer's strategy

<https://www.gov.uk/government/publications/recognised-valued-and-supported-next-steps-for-the-carers-strategy>

Guidance issued by external organisations

NICE: Child maltreatment: when to suspect maltreatment in under 18s

<https://www.nice.org.uk/guidance/CG89/>

Supplementary guidance to support assessing the needs of children

Child abuse concerns: guide for practitioners

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Safeguarding children

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

Prevent Duty

Counter-Terrorism and Security Act 2015

<http://www.legislation.gov.uk/ukpga/2015/6/contents>

Prevent duty guidance

<https://www.gov.uk/government/publications/prevent-duty-guidance>

'Channel' guidance

<https://www.gov.uk/government/publications/channel-guidance>