

Adult Education in Gloucestershire

Policy and Procedures for Safeguarding and Prevent

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1 Introduction: A Whole Organisation Approach to Safeguarding

Gloucestershire's Adult Education Service (AES) is committed to raising staff / learner awareness of all aspects of safeguarding, preventing abuse where possible and ensuring that robust procedures are in place for dealing with incidents of abuse.

Adult Education in Gloucestershire is responsible for setting the procedures and policies, but it is the partner's responsibility to ensure that they comply per the policy.

This policy document considers strategic approaches to safeguarding, learner involvement and the extent to which safeguarding policy and practice are embedded and are effective across the whole organisation.

Adult Education in Gloucestershire will ensure that this policy is in accordance with the procedures of GCC Safeguarding Adults Board and GCC Safeguarding Children Board. These procedures are written in the context of the Gloucestershire County Council (GCC) Safeguarding Adults Policy, Procedure and Good Practice Guide which gives full information and can be found at:

<https://www.gloucestershire.gov.uk/gsab/i-am-a-professional/multi-agency-safeguarding-policy-and-procedures/multi-agency-safeguarding-policy-and-procedures/>

The GCC Safeguarding Children Board guidelines can be found at:

<https://www.gscb.org.uk/i-work-with-children-young-people-and-parents/guidance-for-working-with-children-and-young-people/>

Each provider must review and develop their strategic and operational responsibilities as outlined below:

1.1 Strategic responsibilities

Providers must ensure the following are in place:

- a safeguarding policy with effective systems for monitoring its implementation
- updated policies to include the Prevent Duty and the embedding of British values
- protocols for sharing information
- effective planning and co-ordination of services and allocation of resources
- effective partnerships with other agencies including Adult and Children's Services' safeguarding teams; and local Safeguarding Boards
- senior named person to have specific responsibility for safeguarding issues.

1.2 Operational responsibilities

All staff and volunteers must ensure that a safe and secure environment is provided for adults and children.

If the learning is being delivered in a school, children's Centre, Youth Service setting, or residential care home and staff are concerned about a child or young person, they should report to the designated person at the setting in the first instance and inform one of AES in Gloucestershire's Designated Safeguarding team

Policies and procedures are put into operation for recruiting staff and volunteers; risk assessments; record keeping; and dealing with concerns and allegations of abuse.

In the case of abuse having taken place there should be clear arrangements to support individuals involved as the top priority and consideration. Support for those involved in a wider context including learners, staff and local community should also be a consideration.

2 Promoting the Safeguarding of Learners

safeguarding arrangements are in place and regularly reviewed to keep all staff and learners safe

staff, leaders, governors and supervisory bodies (where appropriate) and volunteers receive appropriate training on safeguarding, which is updated regularly
leaders, governors and supervisory bodies (where appropriate) fulfil legislative requirements, such as those for disability, safeguarding, and health and safety
appropriate arrangements for health and safety protect staff and learners from harm.

3 Definitions of Abuse, Harm and Neglect

Abuse is the violation of an individual's human rights by another individual or individuals and/or the undue exercise of influence or power over a vulnerable person, taking into account the capacity of that person to make their own decisions about the choices available to them.

Abusers can be:

- Relations or friends
- Paid care workers
- Members of staff
- Other learners
- Members of the public
- Learners themselves (self-harm).

Types of Abuse

There are many types of abuse, these include:

- Physical
- Sexual
- Financial
- Emotional
- Neglect

Please see appendix 1 for more detail on the types of abuse.

Definition of a Vulnerable Adult:

The concept of a vulnerable adult no longer appears in DBS (Disclosure and Barring Service) documentation and teaching is not regarded as a regulated activity when working with adults.

We remain aware of the additional needs of learners in any adult education class who were previously considered vulnerable adults. A vulnerable adult is a person over 18 who is or may be in need of community care services by reason of mental or other disability, age, or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Definition of a Child or Young Person:

In the context of Safeguarding, a child or young person is anyone under the age of 18. AES in Gloucestershire works with children and young people in family learning programmes. AES in Gloucestershire enrolls learners on mainstream programmes who are 16 and above following ESFA funding rules for eligibility. AES in Gloucestershire will sometimes run specific classes in partnership with other organisations for 16 -18-year-olds.

4 Bullying and Harassment

Adult Education in Gloucestershire is committed to providing a supportive, friendly, safe and positive learning and working environments for all learners and staff so that everyone can function in a secure atmosphere, which will enable them to maximise their experience and personal potential. Bullying, harassment and anti-social behaviour will not be tolerated in any form.

Staff at every level are responsible for ensuring that the learning environment is free from bullying and harassment. Tutors have a vital role to play with learners in ensuring that they manage the learning environment appropriately, setting an appropriate tone and putting in place standards from the outset to eliminate opportunities for bullying and harassment. Managers and officers are responsible for the implementation of this policy, for ensuring that all their staff, including tutors, as well as their learners, partners, stakeholders and other individuals that learners have contact with, are aware of this policy, and for taking corrective action to ensure compliance with it.

Bullying

Bullying is to intimidate, threaten, humiliate or persecute someone. It is unwanted behaviour by one or a group of individuals directed towards another, which is not justified by their relationship, and which is offensive to the recipient or others. This does not relate to the discomfort of a learner with a tutor or other staff member exercising their legitimate role in advising, instructing, monitoring or assessing their performance but might relate to the way it is carried out.

Harassment

Harassment can take many forms, occur on a variety of grounds and may be directed at an individual or a group of individuals. Harassment has been defined by legislation as “conduct which has the purpose or effect of either violating another person’s dignity or creating an offensive environment that is intimidating, hostile, degrading, humiliating or offensive. It is not the intention of the perpetrator but the deed itself and the impact on the recipient, which determine what constitutes harassment”.

Any complaint about bullying, harassment or anti-social behaviour should be promptly investigated. Behaviours which will be interpreted as bullying, harassment or anti-social behaviour include:

- ‘picking on’ someone and causing them distress or discomfort
- name-calling which may cause hurt and offence
- unwanted physical contact or abusive comments regarding someone’s race, gender, sexuality, disability, culture or religion
- constant interruption, shouting or undermining someone
- gossiping in order to undermine and damage others
- unwanted, uninvited, offensive and derogatory statements and comments – either verbally or in writing
- abusive or patronising language or gestures, jokes or remarks

- circulation of sexist, racist, homophobic, xenophobic or discriminatory material
- unwanted comments on dress, appearance, size, lifestyle or body language
- offensive graffiti or badges
- intrusive questioning, banter, threats, gestures or insults; excluding someone
- misuse of computer technology to target potential victims
- exercising undue pressure on some to bully, harass or discriminate against another person
- damaging other people's goods and property
- offensive, unwanted, repetitive, obscene or malicious phone calls.

5 Online E-Safety

Adult Education in Gloucestershire understands the importance of providing safe access to the wealth of online information and communication tools available to support teaching and learning.

- Our aims are to provide opportunities for all learners to use internet technologies safely as part of their learning activities.
- Adult Education in Gloucester are aware of its responsibility to educate learners and staff about potential risks of internet use and the mitigations needed to protect themselves online
- All GCC IT equipment is provided by and maintained through GCC ICT service. Safeguards and web blocking to prevent access to undesirable sites on the internet / dark web are maintained centrally by GCC ICT following a process and systems agreed with the Local Safeguarding Boards. Internet usage is monitored, and misuse is reported on by GCC's ICT service. Internet users must not use internet facilities to break the law or incite crime. GCC will co-operate with law enforcement agencies in such cases.

The following will be strictly adhered to by AES staff, tutors, assessors and learners:

- Internet Users must not gain unauthorised access or make unauthorised modifications to computer material (hacking).
- Internet Users must take all reasonable care not to distribute copyright material in breach of copyright.
- Internet Users must take all reasonable care not to distribute defamatory material.
- Internet Users must not display access, use, extract, store, distribute, print, reveal or otherwise process information which contravenes the law.

Adult Education in Gloucestershire tutors and assessors ensure that all learners on all courses are aware of issues relating to e-safety within the curriculum, including the need to install protection on their own machines.

All staff are issued with a work email address and must use this in any communication with learners. Staff are issued with GCC computers and mobile phones, and the Leadership Team will ensure that sufficient controls are in place to minimise risks.

All social media associated to Adult Education is managed by Adult Education social media team under the guidance of the GCC social media team and only these pages are authorised for use, all other personal promotional pages should be deleted.

Adult Education in Gloucestershire will work in partnership with all relevant stakeholders and learning providers to promote and secure the concept of the safe learner in respect of internet and e-safety.

With the current speed of on-line change, some learners have only a limited understanding of online risks and issues. They may underestimate potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

Some of the risks could be:

- unwanted contact
- grooming or radicalisation
- reading inappropriate materials
- online bullying including sexting
- identity theft or invasion of privacy
- breaking copyright law
- digital footprint.

5.1 Implementation

The use of the internet, email and other e-technologies by staff and learners is permitted and encouraged where such use supports goals and objectives of the learning programme.

All learning providers will have their own internet safety policy, and this should include practical steps that will achieve the objectives of this policy by providing and maintaining high standards of safety for staff and learners, as far as is reasonably practicable. The provider will:

- do everything possible to ensure that hardware, software and networks are safe and secure, using filtering, encryption, firewalls and anti-virus software
- assess their use of technology for risks to staff, learners and information security
- ensure that all users of technology abide by the County Council's and/or their learning providers Acceptable Use Policy/Statement
- educate all learners using IT as part of their class, in safe use of the internet, providing training and information for their staff, embed online safety in all policies and where appropriate curriculum plans.

6 Safer Recruitment Procedures

Adult Education in Gloucestershire will scrutinise applicants, verifying Right to Work in the UK and qualifications, obtaining suitable references and checking previous employment history.

	Role	Requirement
1	Safeguarding officer including DSL	Enhanced DBS and check against adult and children's barred list
2	Tutors, support workers and volunteers who work in schools during school hours	Enhanced DBS and check against children's barred list
3	Family learning Tutors who regularly work in schools	Enhanced DBS and check against children's barred list
4	Tutors who teach in all other settings including support Tutors	Enhanced DBS
5	All other Staff	Basic DBS

It has also been recently suggested by the Department for Education in their new draft guidance that as part of the shortlisting process for new staff, we should consider carrying out an online search (including social media) as part of our due diligence on the shortlisted candidates.

This has been suggested to help identify any incidents or issues that have happened, and are publicly available online, which we may want to explore more with the applicant at 'interview'

Relevant Tutors, assessors and managers are DBS checked according to role:

Adult Education in Gloucestershire follow GCC requirements and implement new procedures as they come into force. Recruiting managers will have training in safer recruitment practice, as well as safeguarding training.

Relevant staff will be DBS checked when starting work with AES and documentation must be shown to line managers if using a 'portable' DBS check. If the tutor is going to teach groups of young people or children or work in a regulated place, a satisfactory clearance must be obtained in advance.

The risk assessment will be done by the recruiting manager and will take into account factors such as any previous DBS for a similar role (the original must be seen); whether the member of staff will work at a main site or at another venue, whether the person has a significant gap in their employment history. Managers should always arrange for a checked member of staff to support until the check comes through.

GCC requires all DBS checks to be renewed after 3 years. Responsibility for ensuring DBS checks are renewed on time rests with the Designated Safeguarding Officer.

Providers must develop safer recruitment procedures for paid and voluntary staff to create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children. Governing bodies and management teams must act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence, including criminal record checks) Disclosure and Barring Service (DBS) checks) and barred list checks, together with references and interview information.

Vetting staff and volunteers by conducting various checks is one of a menus of actions that education and training providers should undertake when recruiting.

In addition, in some cases where a tutor is working with groups of adults where the adults in the group and the activities fall into the pre-September 2012 definition of regulated activity, the tutor may be eligible for, but not legally required to have, an enhanced criminal records check without barred list information. Information on Regulated Activity in relation to adults, as defined in the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012, is contained in [Regulated activity \(adults\) August 2012](#) (Department of Health).

It is not expected that providers will request criminal records or barring checks routinely for other adult learning tutors. It is the responsibility of providers to familiarise themselves with the statutory requirements for safeguarding; to identify staff roles that require DBS checks, and to maintain an appropriate single central record.

7 Induction, Training and Development

All employees should receive relevant induction that includes advice on appropriate conduct with children and adults and should be given direct access to the organisation's Safeguarding Policy and clear guidance on safeguarding procedures. Appropriate ongoing training and CPD opportunities for staff should be provided, including training on the issues of safe working practices and on creating safe environments for children and adults. Staff should update their training annually and those staff who are regularly dealing with safeguarding issues should update at least every three years. Where appropriate, staff appraisal reviews should include discussion about safeguarding issues. Providers are responsible for ensuring that staff are conversant with the policies and procedures, have undertaken initial training and receive regular and ongoing training and support.

The new draft DfE guidance suggests that whilst the majority of governors already undertake some form of safeguarding training, they intend to make the need more explicit. The new draft guidance states that governing bodies and provider proprietors "should ensure that all governors and trustees receive appropriate safeguarding and child protection training at induction". This training "should be regularly updated".

The consultation document states that training is "essential to ensure new governors/trustees understand their roles and responsibilities, particular in them taking a strategic rather than an operational approach".

All staff need to be aware of the processes to be followed if there are concerns about the conduct of colleagues or other adults towards children and adults and the need to record and share all such concerns, however, minor. Staff should be alert to any indications that a child or adult may need to be safeguarded from harm and know who to contact if they have concerns.

8 Learner Involvement

Learner involvement in the management and organisation of the learning provision is important for the quality improvement agenda. Learners should be involved in creating a safe and secure learning environment through induction, consultation, reviews and curriculum-based activities.

Initial assessment and individual reviews provide opportunities for tutors to identify areas of concern for learners and address these through individual learning and/or course plans. These should be regularly reviewed by tutors and learners. Learners are asked for feedback during and at the end of their course and their personal safety and well-being should be included in this process.

9 Disseminating Information to Learners and Staff

Providers should ensure that information and knowledge about discrimination, equality, wellbeing, personal safety and security are conveyed and embedded in the curriculum and are supported by the culture of the organisation and corporate and individual behaviour.

Reference to these aspects should be included in learner and staff handbooks, posters and information leaflets, web-based resources and any other forms of communication with staff and learners.

10 Principles of Obtaining, Recording and Sharing Information

Where there are concerns about the safety and well-being of children or adults it is vital that information is shared with relevant organisations: most decisions to share information require professional judgement. There must be a legal basis for sharing information and a legitimate purpose for doing so. Whenever information is shared, it is important that the information should be recorded along with the date, the person(s) it was shared with and for what purpose.

A failure to share information, even at a level of 'niggling worry' may have serious consequences for the welfare of a child or adult and it is important that individuals are not deterred from sharing information because of perceived legal hurdles, or assuming that the 'safer' course is not to share information.

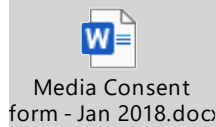
The DfE have also added a paragraph to the new draft guidance that states "all staff should be aware that children and adults may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as "harmful"

The General Data Protection Regulations do not prevent, or limit, the sharing of information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

11 Photo, Video and Audio Consent

There is a requirement to obtain the permission of anyone appearing in photographs, audio and videos recordings. This includes children and adults.

If you wish to obtain pictures or videos of any adult or child than please ensure that the attached form is used and permission is sought from the adult or parent/carer



Managers are responsible for ensuring that clear guidance is available to staff and volunteers; that staff are aware of the requirements; and that appropriate consent forms are readily available and are appropriately used.

12 Dealing with Concerns

Staff should be made aware of the procedures to follow if s/he has a concern about any child's or adult's welfare. In cases where a child or adult discloses that s/he is being, or has been, harmed or abused, or such a disclosure is made by a staff member, learner or member of the public, the member of staff should record the nature of the concern in writing and speak to his/her line manager who will contact the Safeguarding Officer. It is the role of the Safeguarding Officer to assess the concerns to determine whether an external referral to Children's Services, Adult Services or the police needs to take place, or whether the matter can be addressed via the County's internal procedures.

The Safeguarding Officer should have received adequate safeguarding training and his/her role and responsibilities should be clearly defined in the job description. Where a staff member is unable to make contact with their line manager, or Safeguarding Officer / Designated Lead they will be required to contact the MASH (Multi Agency Support Hub) directly to seek advice and then communicate to their line manager and a Safeguarding Officer / Designated Lead the discussions that they have had with the helpline staff.

To refer a concern to MASH in such circumstances staff should complete the Inter Agency Referral form (MARF) via the following hyperlink [MARF Form](#)
All immediate safeguarding concerns should be made initially by telephone on the Children's Professionals line, or by email - Gloucestershire MASH contacts:
Gloucestershire Police 01452 753458
Email Mash Police : cruenquiries@gloucestershire.pnn.police.uk

GCC Childrens Helpdesk 01452 426565
Email : childrenshelpdesk@gloucestershire.gov.uk

Where a referral is to be made externally, the appointed officer will report the matter to Children's Services, or Adult Services, and/or to the police. The external agency will conduct their own investigation regarding their policies and guidelines. Anonymity may not be maintained on reporting.

12.1 Sub-contracted Provision

Providers delivering work under sub-contracted provision must ensure that their own policies are in line with the Adult Education in Gloucestershire policy and procedures.

In addition, sub-contracted providers must provide Adult Education in Gloucestershire with information relating to concerns, disclosures, actions taken and the outcomes. This information should be summarised and sent to Designated Officer within 24 hours of any concern or incident. A monthly summary of safeguarding concerns (Safeguarding and Prevent), should be submitted monthly by email to the Designated Safeguarding Officer via email : nick.morrall@gloucestershire.gov.uk

This process will naturally form part of contract monitoring and performance reviews.

13 Dealing with Allegations of Abuse

In all cases where there are allegations of abuse, it is vital that these are dealt with fairly, quickly and consistently.

13.1 Allegations against members of staff

This procedure should be used in any case in which it is alleged that a member of staff or volunteer has:

Behaved in a way that has harmed a learner or may have harmed a learner.
Possibly committed a criminal offence against or related to a learner.

Behaved in a way that indicates s/he is unsuitable to work with children, young people or vulnerable adults.

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff to abuse.

All staff working within AES must report any potential safeguarding concerns about an individual's behaviour towards children, young people or vulnerable adults immediately. Allegations or concerns must be reported directly to a member of the AES Leadership Team unless the concern relates to the Head of Service. If the concern relates to the Head of Service, it must be reported immediately to Pete Carr, Head of Employment and Skills.

A member of the AES Leadership Team will carry out an initial consideration to establish whether there is substance to the allegation. If there are credible child protection

concerns, the member of Adult Education in Gloucestershire Leadership Team will notify the Local Authority Designated Officer (LADO) team. The LADO team will advise about action to be taken and may initiate referrals. If there are no credible child protection concerns, internal disciplinary procedures may need to be used to address the issue. In this case a written record must be made of the decision and reasons for it.

The LADO can be contacted on 01452 426 994, 01452 425 017 or 01452 426 320.

Any member of Adult Education in Gloucestershire who is accused or suspected of mistreating a child is advised to:

Contact their union representative

Keep records of all conversations, meetings attended, letters received and telephone calls relating to the allegation.

13.2 Procedures for Children and Young People

Abuse of children and young people: If anything should arise which causes a member of staff to believe that a child or young person has been or is at risk of significant harm or abuse, it is their responsibility to report it to a Designated Safeguarding Officer. In the case of classes run in partnership, this will normally be to the designated staff at the setting and AES designated Safeguarding Officers should be informed. Even if staff have only heard rumours of abuse or have a suspicion but do not have firm evidence, they should still contact the designated person to discuss their concerns.

Record it as accurately as is possible. The child or young person should not be asked any 'leading' questions but should be allowed to disclose whatever they may want to. They should also be made aware that the information may need to be passed on in confidence and who it will be passed on to. The report should be signed, dated and immediately given to the designated person as well as a copy stored in a secure place.

Considering all the information available, the Designated Safeguarding Officer will decide on the next steps, which may include taking no further action, monitoring the situation or making a referral. The full details of the GCC Safeguarding Children's Board can be found here:

14 Whistle Blowing

Adult Education in Gloucestershire is committed to the highest standards of openness and accountability and takes all incidents seriously. All staff have a right and duty to report concerns seriously. All workers have a right and a duty to report concerns that are in the public interest.

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker raises a concern about a danger, illegality or incident that affects others, for example members of the public.

A worker who has a whistleblowing concern should report it to their line manager or senior manager verbally or in writing in the first instance and at the earliest opportunity.

15 Embedding Quality Processes in Safeguarding Practice

It is important that learning providers have a quality assurance framework for safeguarding practice in their organisations. A set of standards enables providers to carry out a self-assessment of the provision. This quality process, and any subsequent evaluation of the quality process, is an effective way of ensuring that safeguarding practice is checked.

A framework for self-assessment of safeguarding practice incorporating the duties and responsibilities of learning providers is included at. This framework outlines guidelines for good practice in safeguarding. However, it is the responsibility of each learning provider to identify the most appropriate strategic approach and adapt this to their circumstances.

16 The Prevent Duty

16.1 What is the Prevent Duty?

In 2010 the Government published the Prevent strategy which addresses the specific need to safeguard adults, young people and children from extremism, radicalisation and terrorism. AES in Gloucestershire values freedom of speech and the expression of beliefs as fundamental rights underpinning British Values. Whilst we value free speech, we also believe it is subject to the laws and policies governing equality, human rights, community safety and community cohesion and we encourage our learners and staff to uphold the fundamental British Values of the rule of law, mutual respect and democracy.

AES in Gloucestershire seeks to protect learners from the messages of radicalisation and extremism including, but not restricted to, those linked to far-right extremism, environmental extremism, religious extremism and animal rights extremism. We are committed to supporting those who are vulnerable to radicalisation and extremism. We have in place a Prevent Risk Assessment Register and Action Development Plan to ensure staff have up to date knowledge regarding risks.

Indicators of vulnerability include:

Identity Crisis – the learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society.

Personal Crisis – the learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.

Personal Circumstances – migration; local community tensions; and events affecting the learner's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism, hate crime, or discrimination or aspects of Government policy.

Unmet Aspirations – the learner may have perceptions of injustice; a feeling of failure; rejection of civic life.

Experiences of Criminality – which may include involvement with criminal groups, imprisonment and poor resettlement / reintegration.

Special Educational Need – the learner may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive, nor does it mean that all learners experiencing the above are at risk of radicalisation and extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing extremist websites, especially those with a social networking element
- Possessing or accessing extremist literature

- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organizations
- Significant changes to appearance and / or behavior
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

However, we are aware that some of these factors may be related to other Safeguarding concerns.

Concerns about radicalisation and extremism should be referred / reported to PC Adam Large of the Gloucestershire Police who is the 'Single Point of Contact', or another member of the AES Safeguarding team in his absence. The Safeguarding Lead and Safeguarding Officers in the AES team should be informed of any referrals.

**PC Adam Large / Matt Morris Prevent Officer - Gloucestershire Constabulary
Waterwells, 1 Waterwells Drive, Gloucester, GL2 2AN.**

**Ext 2802. Direct Dial 01452 752802 Group – 01452 754319 Force Control Room - 101
Email : Special.Branch@gloucestershire.pnn.police.uk**

16.2 What are British Values?

British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"; institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010.

- All staff have a legal responsibility under the Prevent Duty:
- All staff and volunteers must attend safeguarding and Prevent duty training as identified or provided by their institution.
- All staff and volunteers are expected to uphold the values embedded within the Equality Act 2010 at all times and embed these values into their practice.
- All staff and volunteers should use any relevant opportunities to promote the values.
- All staff and volunteers must report any safeguarding and Prevent concerns to the named staff responsible in their organisation.
- All staff and volunteers should always refer concerns to the appropriate Prevent (normally the safeguarding) team internally.

Adult Education in Gloucestershire highlights how the service promotes and exemplifies British values and provides examples of applying this through policies, procedures and delivery.

For guidance on Prevent and Channel Programme please see appendix 4.

17 Examination Guidance

17.1 Our awarding and examination bodies have a duty to inform Adult Education of any Safeguarding and Prevent concerns they may identify. This could relate to information they witness in the course of an examination or something that learners may have written. Pearson policy can be found at Appendix 7. We also use Training Qualifications UK and all the online delivery will make reference to the AES Safeguarding policy and what to do if there is a concern.

Appendix 1

Types of abuse and neglect

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Physical – the use of force resulting in pain or injury, for example by hitting, shaking or burning or by female genital mutilation.

Sexual – the involvement in sexual activity which is unwanted or not understood or with a minor. This could be forced marriage, child sexual exploitation, harassment, teasing or innuendo.

Financial – use of a person's income or assets without their informed consent, for example taking money or possessions, fraud.

Emotional – behavior which has a harmful effect on emotional health and development, for example insults, threats, humiliation, all kinds of hate crime, bullying (including cyber bullying) and includes unreasonable exertion of influence over an individual.

Neglect – a lack of care, for example insufficient food, medication not given, lack of access for personal hygiene.

Discriminatory – abuse motivated by discriminatory attitudes, for example towards race, religion, culture, gender, disability, sexual orientation.

Institutional – accepted working practices or procedures of a service have an abusive effect on some or all users of that service, for example lack of privacy or supervision, lack of choice and consideration.

Extremism – vocal or active opposition to the British values of “democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs”.

Sexual Exploitation – occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

Grooming, including online grooming – occurs when someone builds an emotional connection with another person to gain their trust for the purposes of future sexual abuse or other exploitation.

Appendix 2

Specific safeguarding issues

All staff should have an awareness of safeguarding issues, some of which are listed below.

Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting put children in danger.

- bullying including cyberbullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking.

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Female Genital Mutilation Mandatory Reporting Duty

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for staff to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college’s designated safeguarding lead and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Patterns of Abuse

Most incidents of abuse by staff and volunteers towards children, when seen with hindsight, contain prior indications of the potential for abuse that have been missed, ignored or overlooked by the department. Sexual abuse in particular is likely to be characterised by a process of grooming of one or more youngsters prior to a specific act. This will often consist of blurring of boundaries with children to allow opportunities for abuse to take place.

It is essential that managers are fully aware of this possibility and are alert to indications of conduct that could be part of a grooming process.

“Grooming” can constitute an offence and applies to specific behaviour towards children up to 16 years. Further, whilst the age of consent for sexual activity is 16, any sexual activity between a pupil/student up to the age of 18 and a member of staff, even if perceived to be with the consent of a pupil, is an ‘Abuse of Trust’ offence and should be brought to the immediate attention of the Safeguarding Officer who will liaise with the Local Authority Designated Officer (LADO).

Activities that might arouse suspicion or merit further investigation, especially when conducted in a clandestine manner, and are contrary to the department’s policy, and which occur in combinations in relation to the same member of staff or volunteer might include:

- meeting or visiting children and young people outside of the activity
- offering extra support to individual children and young people

- placing themselves in closed rooms or inappropriate situations with a child or young person
- a series of minor concerns about physical contact
- inappropriate behaviour/conduct/boundaries with children or young people
- use of inappropriate and/or familiar language
- communicating electronically children or young people
- underperforming in their job linked to other behavioural concerns
- a history of frequent moves from job to job working with young people or children
- constantly ignoring rules about safe levels of staff to children/ young people ratios.

Allegations of abuse made against other children or young people

Staff should recognise that children and young people are capable of abusing their peers, and there are many forms of abuse that may occur between peers. This list is not exhaustive:

- physical abuse (biting, kicking, hair pulling etc)
- sexually harmful behaviour (inappropriate sexual behaviour, touching, sexual assault etc)
- bullying (physical, name calling, homophobic etc.)
- cyber bullying
- sexting
- initiation, hazing
- teenage relationship abuse.

Special educational needs and disabilities

Children/young people who have special educational needs and/or disabilities can have additional vulnerabilities when recognising abuse and neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers
- have fewer outside contacts than other children
- receive intimate care from a considerable number of carers, which may increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries
- have an impaired capacity to resist or avoid abuse
- have communication difficulties that may make it difficult to tell others what is happening
- be inhibited about complaining for fear of losing services
- be especially vulnerable to bullying and intimidation
- be more vulnerable than other children to abuse by their peers.

What you should do if you think a child is being abused

If you have any concerns because you think that a child might be being abused, don't assume that someone else is doing something about it, you must do the following:

- In an emergency (i.e. a serious incident, the child is in need of medical attention or a crime may have occurred) call 999.
- Contact your line manager who will report your concerns to Children's Services.

- If you are unable to contact a line manager use the Children's or Adult Services helplines for advice: Childrens Services 0300 555 1384, Adult Services 0300 555 1386.
- Keep a record of your concerns and any action taken.

Appendix 3

Adult Education in Gloucestershire Reporting Process

What you should do if you think someone is being abused:

If you have any concerns because you think that an adult is being abused, don't assume that someone else is doing something about it, you must do the following:

- In an emergency (i.e. a serious incident, someone is in need of medical attention or a crime may have occurred) call 999.
- NON-EMERGENCY- contact line manager on same day and write a report on what you have seen or heard. Sign it and include date and time.
- Contact your line manager who will report your concerns to Adult Services.
- If you are unable to contact a line manager use the helplines below for advice:

Social Services Teams for referrals:

Gloucestershire County Council (Adult Help Desk) **01452 426868 / Emergency Duty Team - out of hours 01452 614758**

socialserviceseng@gloucestershire.gov.uk

Gloucestershire County Council (Children's Help Desk) **01452 426565**
childrenshelpdesk@gloucestershire.gov.uk

Police

In an emergency phone 999
To report a crime 101

Keep a record of your concerns and any action taken.

AES Designated Safeguarding Lead:

Nick Morrall

Tel: 01452 583676

Mobile: 07900 135123

E: nick.morrall@gloucestershire.gov.uk

AES Safeguarding Officers:

Natasha Panchbhaya

Tel: 01452 583842

Mobile: 07795 265598

E: natasha.panchbhaya@gloucestershire.gov.uk

Nusrath Khan

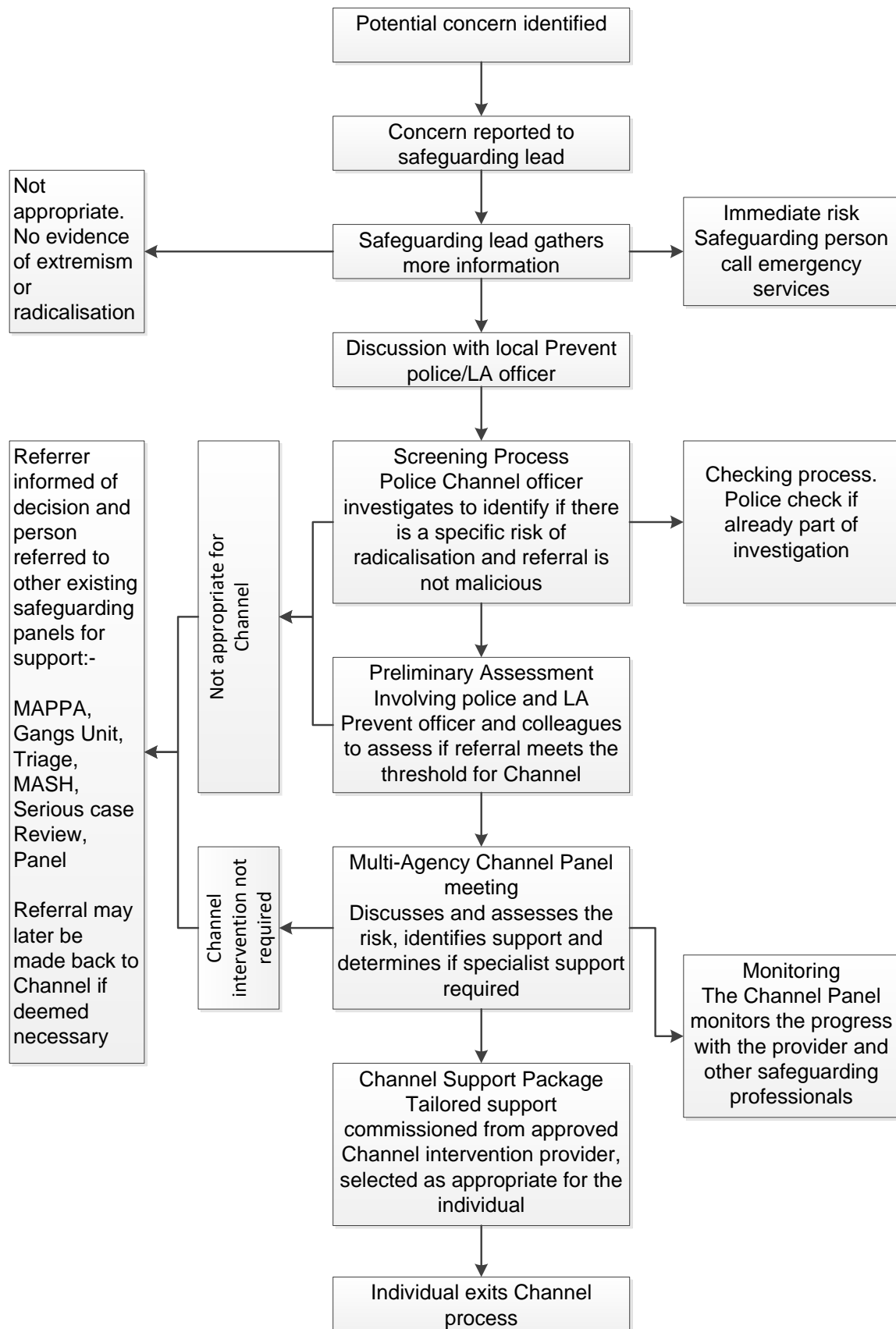
Tel: 01452 583536

Mobile: 07768 803257

E: nusrath.khan@gloucestershire.gov.uk

Appendix 4

The Channel Process



Appendix 5

A Quality Framework for protecting children and adults from abuse and neglect (example template)

Theme	To what extent...	Evidence
1 – Partnership	<ul style="list-style-type: none"> Is there a commitment to working with existing local safeguarding boards and other health and social care partnerships? 	
2 – Accountability, roles and responsibility	<ul style="list-style-type: none"> Are there clear lines of accountability within the senior management, governing body or corporation of the organisation that show where responsibilities lie? Is there a clear indication of who has the responsibility and at what level for different aspects of safeguarding children and adults? 	
3 – Rights and values	<ul style="list-style-type: none"> Is there a clear statement that shows the organisation's values and belief in relation to individual rights to freedom from abuse and harm? Does it state the expectation for the whole organisation to demonstrate these values through corporate and individual behaviour? 	
4 – Tolerance levels	<ul style="list-style-type: none"> Is there a clear statement for all learners and staff which indicates that there is zero tolerance of abuse and other harmful behaviours? Do policies and procedures direct both staff and learners towards taking appropriate actions when abuse and harmful behaviours occur? 	

	<ul style="list-style-type: none"> • Are these policies and procedures having an impact? 	
5 – Risk assessment	<ul style="list-style-type: none"> • Does the risk management system work in relation to safeguarding vulnerable groups? 	
6 – Policy	<ul style="list-style-type: none"> ▪ Are there policy and procedures for safeguarding children and adults? • Do all staff know about these? 	
7 – Staff and volunteer recruitment	<ul style="list-style-type: none"> • Does the organisation demonstrate their commitment to good quality processes in the recruitment and vetting of new staff and the monitoring of existing staff and volunteers? 	
8 – Capacity and capability	<ul style="list-style-type: none"> ▪ Is there a clear commitment to training all staff at all levels on the issue of safeguarding vulnerable adults? • Is there a range of staff training opportunities? 	
9 – Information and communication	<ul style="list-style-type: none"> ▪ Is information for learners and staff (on safe guarding, abuse and how to seek help) both available and accessible? ▪ Is there a clear communications system for issues of safeguarding, including reporting of allegations or concerns? • Does information on safeguarding and health feature in all communication processes, such as on the Internet, intranet, in handbooks and on notice boards? 	
10 – Curriculum	<ul style="list-style-type: none"> • Are personal safety rights and responsibilities embedded into the curriculum for all learners? 	
11 – Involving learners / learner induction	<ul style="list-style-type: none"> ▪ Has the organisation ensured that learners are included in identifying, developing and monitoring the impact of safeguarding work, from developing the partnerships, policies and procedures to monitoring and evaluating its effectiveness? • Is safeguarding part of induction for all learners and staff? 	

Appendix 6

Safeguarding contact details:
Gloucestershire MASH contacts

Gloucestershire Police 01452 753458

Email Mash Police : cruenquiries@gloucestershire.pnn.police.uk

GCC Childrens Helpdesk 01452 426565

Email : childrenshelpdesk@gloucestershire.gov.uk

Gloucestershire County Council LADO 01452 426 994, 01452 425 017 or 01452 426 320.

Social Services Teams for referrals:

Gloucestershire County Council (Adult Help Desk) 01452 426868 / Emergency Duty Team - out of hours 01452 614758
socialserviceseng@gloucestershire.gov.uk

Gloucestershire County Council (Children's Help Desk) 01452 426565

childrenshelpdesk@gloucestershire.gov.uk

PREVENT - Police contacts:

PC Adam Large / Matt Morris Prevent Officer - Gloucestershire Constabulary
Waterwells, 1 Waterwells Drive, Gloucester, GL2 2AN.

Direct Dial 01452 752802 Group Ext 2802

01452 754319

Police Control Room - 101

Email : Special.Branch@gloucestershire.pnn.police.uk

Appendix 7

This policy is for Examiners marking Pearson Qualifications

How to raise a safeguarding concern

You may have a concern about a child or adults at risk because of:

- Learner or candidate work you have seen.
- Reports that you have received.

The contact or information you have may be from direct or online contact. The concern may be that the individual is at risk of harm from others or from themselves. Sometimes you might not have much information and might worry about raising a concern as a result. However, the safest option is to always report any safeguarding concerns as soon as you can.

Contact the Pearson Safeguarding team to raise your safeguarding concerns, this can be done in these ways:

- Directly using the email address safeguarding@pearson.com.
- Associates should raise concerns found in learner work using the online Safeguarding- raising a concern form.

You should include as much detail as possible, including your name and position, the nature of your concerns and the evidence that gave rise to your concerns. If you are an Associate raising a concern based on a disclosure in an exam paper marked on ePen it is essential that you include the document identification number of the paper and exam series.

The safeguarding team will consider any report, seeking legal advice where necessary, and will act, which may involve referral of the incident to the appropriate authorities, within 24 hours for any incident where there may be the threat of harm to themselves or others, and within three working days for all other incident incidents.

The Safeguarding team will contact the centre involved and liaise with their Designated Safeguarding Lead to ensure support is given to any child or adult at risk about whom the concern is raised.

The safeguarding team will confirm receipt of your concern and if requested let you know when action has been taken but cannot discuss the incident further, except for clarification. If any Associates have any concerns about the action being taken, they can raise it with the Pearson Associate Management team.

All sensitive information received by Pearson in relation to a safeguarding case is kept confidential and secure, including dates and details of the referral, the feedback received from the school or institution Pearson inform, the procedures followed, and the outcome of advice given by Social Services, as appropriate. This information will be held in line with Pearson's data retention policy.

