



Group Safeguarding Policy

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Acis Group are a charity that supports people through services including housing, education and skills.

1. What this policy is about and why we need it?

This policy confirms Acis' group-wide commitment to safeguarding.

We recognise and believe that safeguarding matters. We have a legal, contractual, and moral duty to protect children and adults at risk and to assist statutory authorities in meeting their duties.

We have a clear policy statement and approach to safeguarding that is standard across everyone, regardless of what part of the group you work in or are supported by. This is outlined in this policy and applies to all Acis Group customers, learners, service users, participants, our people, Board members, contractors, volunteers, and any other third party organisations delivering services or working in partnership with us.

Each area within the group works differently and offers very differing services. Specifically our services to children and young people within the education and skills business unit holds different statutory responsibilities to those for adults across all business units. To support this we have a more detailed policy held in education and skills which aligns to this group wide statement to ensure those working within these areas can carry out statutory and regulatory duties responsible to them. This is outlined in the relevant appended policy for that specific area and applies to those working directly in that specific service area only, whether that be team members, contractors, volunteers or any other third party organisation, or those receiving support from that service area at the time of the concern being raised. More widely, should other areas have specific statutory responsibilities that differ from other areas, a detailed specific supporting policy will be in place.

Our legal duty includes the education and training of adults at risk. Any reference in the policy to an adult at risk applies to anyone over the age of 18 who may for a variety of reasons be in need of community services and/or unable to protect him or herself from significant harm or exploitation.

This policy should be read in conjunction with the service area specific policy, as appropriate.

2. Who does this policy apply to?

This policy applies to Acis Group customers, learners, our people, Board members, contractors, volunteers, and any other third-party organisations delivering services or working in partnership with us.

We expect everyone, including volunteers and partners, to endorse and practice their responsibilities to Safeguarding at all times. Everyone has clear roles and responsibilities in delivering to this policy. It is different dependant on role, and in summary:

Responsibilities

Our **Group Board** has overall accountability for Safeguarding and is committed to ensuring that across the Group we have a clear approach, understanding of responsibility

and ownership of Safeguarding. It has appropriate designated and delegated responsibility at Board level, which is:

- *Enterprise Committee* for education, skills and wider enterprise services responsibility and reporting of housing and corporate services activities

Our **Executive Leadership Team** as Directors of the Group have overall responsibility for safeguarding and ensures we have an understanding at all levels, including appropriate training, procedures and practices embedded and delivered to in all service areas. It also ensures safe recruitment practices and clear responsibilities within roles. It ensures nominated individuals within the senior management teams of all service areas understand their duties and responsibilities in respect of legislation, regulation and escalation. Whilst collectively they have overall responsibility for all areas, there is specific designated responsibility within it to the Director for Customer Excellence and Director of Community Investment.

Our **safeguarding steering group** assumes day to day responsibility for Group wide Safeguarding activities, and ensures transparency, best practice and oversight at the relevant areas. They meet together monthly as a minimum. It includes:

- Our Director for Customer Excellence and Director of Community Investment who has designated responsibility on behalf of our Executive Leadership Team for safeguarding.
- Senior Managers with responsibility for key teams whom safeguarding is naturally higher (Head of Customer Support, Head of Corporate Services, Operations Manager – Education and Skills, Operations Manager – Student Services, Principal – Plus Skills Development Limited, CEO – Abbey Access Training)
- Leads responsible for safeguarding within each business unit area, including the designated safeguarding lead (DSL) for education and skills, the safeguarding lead for Housing and tenant support (SLH), and a lead from procurement or commercial to represent contractor delivery. These lead roles will act as their area expert to ensure compliance, policy adherence and safe practice.
- Deputy safeguarding leads within all business areas who are nominated individuals that are suitably trained across the organisation, who will support and guide our people and contractors to deal with concerns raised across the group and support those involved to resolution. These are usually people within roles who have a significant involvement in safeguarding practice across the group. All areas will have their own deputy Safeguarding lead/s to ensure tailored support, but will work closely together to ensure peer support is in place. They will be points of contact for safeguarding queries, with specific responsibility for their area of operation. They are responsible for ensuring that safeguarding matters are managed in line with this policy and for sharing best practice or any safeguarding actions, messages or tasks within their area, including when the DSL is unavailable.

Everyone across the group, regardless of role (including but not limited to our teams, customers, contractors, and volunteers), has a responsibility to promote positive safeguarding procedures and practices, have a thorough understanding of what safeguarding is, our role within this, and the Safeguarding Policy and procedures to report and deal with concerns should they be raised.

The Responsibility Matrix below identifies the significant Safeguarding topics/issues and to who it is assigned to manage those areas.

** delegated individuals within this group to hold appropriate level training and responsibility	All employees and volunteers	Safeguarding Lead for business units	Deputy safeguarding leads	Safeguarding steering group*	People Services	Mental Health First aiders	Procurement and Commercial Manager	Contractors and Partners	Joint Leadership Team	DfCE and DoCI on behalf of Executive Leadership Team	SL on behalf of Board (through enterprise Committee	Acis Group Board and Enterprise Committee members
Completing training												
Safeguarding awareness	X	X	X	X	X	X	X	X	X	X	X	X
Advanced, accredited Safeguarding at the level appropriate to the service area		X	X	X						X	X	
Safeguarding Lead training at the level appropriate to service area		X										
Safeguarding concerns												
Identifying	X	X	X		X	X	X	X	X	X	X	X
Raising	X	X	X		X	X	X	X	X	X	X	X
Support to escalate appropriately		X	X									
Referring to Local Authority Designated Officer with DSL/SL		X	X		X							
Managing investigations against our people					X							
General safeguarding practices												
Safe Working	X	X	X	X	X	X	X	X	X	X	X	X
Safer Recruitment					X			X				
On-boarding contractors and volunteers		X	X		X		X	X				
Wellbeing Support		X	X	X	X	X		X				
Organisational oversight and monitoring		X	X	X					X	X	X	X
Keeping Children Safe in Education part 1		X	X	X	X					X	X	X

Keeping Children Safe in Education (FULL)		X education only	X education only							X		
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Training

Employees and volunteers (including Board members)

We will follow safer recruitment practices in all internal appointments, including appropriate Disclosure and Barring Service checks (dependant on identified within the role description)

All new starters, as part of their intro programme (induction) are required to complete safeguarding training and those working in frontline services receive a safeguarding induction as part of their induction process before commencing their post.

We will provide all our people and volunteers with training appropriate for their role. As a minimum every employee will complete safeguarding awareness training annually, through our e-learning platform APLE. This includes a reminder of safeguarding issues and our policy and procedures.

We will support all our people to recognise persons at risk of and/or experiencing abuse or neglect and to ensure they are aware of their responsibilities and the procedures for safeguarding through wider awareness activities throughout the year. Additionally, we will ensure all roles carry out any mandatory training required by external funders.

Our safeguarding team will receive advanced safeguarding training, and those with specific responsibility areas such as Safeguarding Lead's and Deputy Safeguarding Leads will receive additional training.

Contractors and partners

For those delivering services directly to customers on our behalf we require them (including their sub-contractors) to:

- complete our 'on-boarding' process including proportionate due diligence checks.
- follow safer recruitment practices including appropriate Disclosure and Barring Service (DBS) checks,
- have their own equivalent policy and processes in place (or accept ours as a minimum) and
- report any safeguarding concerns to the relevant Acis Group contract manager via MyConcern.
- attend any contractor or partner training we hold that we identify as a requirement of their organisation to ensure they are in line with policy or legislation changes.

Organisations awarding grants to us, or Acis making grants to other organisations.

We will carry out due diligence when we work with, or make grants to, any other bodies, including delivery partners.

Ensure any grant recipient or partner organisation have appropriate safeguarding procedures in place.

Ensure there are clear lines of responsibility and reporting between all bodies involved.

Customers

We will make our customers aware of who to go to if they want to raise a concern about anyone, or self-disclose through on-site communication, and sharing our policy on our website.

We will support all our customers to recognise persons at risk of and/or experiencing abuse or neglect through wider awareness activities throughout the year.

3. Our Policy Statement

Acis Group recognises its duty of care to safeguard, protect and promote the welfare of children, young people and adults at risk from any form of abuse whilst working with us in any of our service areas. We are committed to ensuring safeguarding practice reflects statutory provision, contractual obligations, government guidance, and best practice.

We will create a safe environment for people to thrive. To do this we will risk assess any venues used for events or training to ensure it is a safe space for all, free from risk of harm. We will use the different ways that we engage with customers (in their homes, in person, in communities, in classroom environments, or via virtual contact) to identify possible safeguarding issues and act on them.

We have a zero-tolerance approach to abuse. We will seek to ensure that any action taken is prompt, proportionate, and that it includes and respects the voice of those concerned.

This policy is underpinned by:

- Our belief that everyone has the right to live free from abuse or neglect.
- Our commitment to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.
- Our acknowledgement that safeguarding is everybody's responsibility and our commitment to preventing abuse and neglect through safeguarding the welfare of everyone.
- Our recognition that health, wellbeing, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.
- Our recognition that there are legal and contractual frameworks within which we need to work to safeguard those who have care and support needs and for protecting those who are unable to take action to protect themselves. We will act in accordance with the relevant safeguarding legislation and with local statutory safeguarding procedures.

To implement this policy, regardless of where in the group, we will:

Identify Safeguarding matters

We will ensure that all of our people are equipped to identify the signs of potential safeguarding concerns and understand the need to refer these through to the Safeguarding team.

Respond to Safeguarding reports

Any safeguarding concern or report will be taken seriously, responded to promptly, and followed up in line with the accompanying guidance and procedures, with the support of a safeguarding team. Within the team, a nominated team will be identified to support every case, with a nominated lead to oversee all cases to ensure transparency and clear lines of communication.

The wellbeing of those at risk of harm will be put first, with active support for those subject to concern to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to as per the accompanying recording and sharing information procedures.

Any actions taken by Acis Group will respect the rights and dignity of all those involved and be proportionate to the risk of harm. Any related whistleblowing will be managed in accordance with our Confidential Reporting Policy.

Manage allegations

All allegations regarding safeguarding issues will be managed in accordance with accompanying guidance and procedures covering Acis Group people (either general or specific to the service area), contractors and/or partners working with/for Acis Group, customers and learners.

On receipt of an allegation, the safeguarding of everyone involved will be prioritised whilst an investigation is carried out. Where required, the concern will be raised with funding bodies.

If this allegation involves an employee, our Head of People Services will be notified and our internal procedure will be adhered to alongside this. These policies are Disciplinary Policy and Confidential Reporting (Whistleblowing) policy.

Multi Agency Working

Where required, we will cooperate with all partners in taking action to safeguard, including supporting any investigations and/or enquiries we are asked to make on their behalf.

We will attend relevant safeguarding meetings and adhere to the terms of reference including completing assigned actions and providing updates and reports. We will refer cases to external safeguarding forums, teams, and panels where appropriate.

If any investigation uncovers a 'serious incident' as defined by the Charity Commission, the Head of Corporate Services will ensure this is reported in line with our procedures.

Record keeping

Confidential, detailed and accurate records of all safeguarding concerns will be maintained and securely stored in line with our Data Protection Policy and Procedures and the General Data Protection Regulation and Data Protection Act 2018.

Records may include information relating to care and/or support needs, which will be used to promote a safe and positive experience. All information will be gathered and stored in line with the Data Protection Policy and Procedures. All safeguarding records will be kept on our MyConcern system.

Adequate information gathering and sharing processes will be put in place to enable us to meet our customers' needs and maintain a safe environment for all.

Complaints

If anyone raising a safeguarding concern feels it has not been dealt with appropriately by Acis Group, they can raise a complaint in line with our Customer Feedback Policy. If the complaint is regarding an employee, they can also use the confidential reporting (whistleblowing) policy. If it is felt appropriate, they should be advised to report their concern to the appropriate statutory agency for further investigation.

Wellbeing Support

Wellbeing support for those involved in safeguarding cases will be available through safeguarding supervision, the Safeguarding steering group, Mental Health First Aiders, PayCare, and support areas of the organisation.

PREVENT: Radicalisation and Acts of Terrorism

The Counter Terrorism & Security Act (2015) & The Prevent Duty Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with. The strategy covers all forms of terrorism, including far right extremism and some aspects of nonviolent extremism. The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Office uses a range of measures to challenge extremism in the UK, including:
 - where necessary, preventing apologists for terrorism and extremism from travelling to this country
 - giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
 - funding a specialist police unit which works to remove online content that breaches terrorist legislation

- supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

This Act places a duty on Acis (and in particular its education subsidiaries), to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty). More widely, across the whole group we acknowledge that we work with customers who may be at risk of radicalisation and seek to provide a framework for how we will protect vulnerable people who are at risk.

We are committed to supporting vulnerable learners through its safeguarding policies and procedures and recognises that this can support our contribution to the Prevent duty. Training is available for all those teams identified across the organisation (and in particular everyone within our education teams where there is a statutory duty), which is delivered as part of their induction, and is revisited each year. We actively promote awareness amongst customers, through tutorial and key themed events throughout the year.

Contact with external services

Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral, further information and advice can be obtained by emailing ctp-em-prevent-referral@linc.police.uk or call 101 and ask for the Prevent Team.

4. How we will monitor this policy

The safeguarding steering group will monitor and review outcomes for all cases on a quarterly basis, identifying any

- issues that require action by e.g. changes to this policy and/or the accompanying procedures
- learning and best practice to share across teams
- themes to drive training and awareness campaigns

This team will report their findings to the senior management team, with reports shared with the executive leadership team, Committees and Board as required, and annually as a minimum.

Safeguarding metrics are reported as part of our performance management framework and shared with all our people monthly, including the Group Board. A more detailed report is shared with our operations and enterprise committees for their relevant areas to provide ongoing assurance of management of cases.

The safeguarding team will review the policy annually (or sooner if required) and procedures regularly.

The team will also review this policy when due for renewal with customers in their service area to ensure it is appropriate.

5. Policies and other documents that link into this policy

5.1 Safeguarding Children and Young People in our education services Policy and Procedure

5.2 Policies that link into this policy are:

- ASB Policy
- Data Protection Policy
- Health & Safety Policy
- Confidential reporting (Whistleblowing) Policy
- Domestic Abuse Policy
- Hoarding Policy
- Equality, Diversity & Inclusion Policy
- Disciplinary Policy
- Code of Conduct
- Customer Feedback Policy
- Modern Slavery Policy
- Integrated Recruitment Policy
- Information security policy

5.3 Other documents that link into this policy are:

- Safeguarding procedures and processes
- Safeguarding Lead- role description (service area specific)
- Deputy Safeguarding Lead role description
- Acis Group Safeguarding Steering Group Terms of Reference
- Data retention schedule
- ICT Monitoring and Filtering policy

6. Links to other legislation and/or regulations

6.1 Legislation and/or regulation that links to this Policy are listed below:

- Care Act 2014
- Mental Capacity Act 2005
- Equality Act 2010
- The Human Rights Act 1998
- The Data Protection Act 2018
- General Data Protection Regulations 2018
- Modern Slavery Act 2015
- Crime and Disorder Act 1998
- Domestic Abuse Act 2021
- Caldicott principles
- Money laundering, Terrorist Financing and Transfer of funds legislation
- The Children Act 1989 (as amended) and 2014
- The Children and Social Work Act 2017.
- Keeping Children Safe in Education 2026.
- Working Together to Safeguard Children 2026.
- The Education Act 2002.

- The Education Act 2011
- Safeguarding Vulnerable Groups Act (2006)
- DfE statutory guidance (2014)
- Protection of Freedoms Act (2012)
- Mental Capacity Act (2005)
- GDPR and Data Protection Act 2018

7. When will this policy will be reviewed

This policy will be fully reviewed in August 2027 or before if necessary as a result of changes prompted by ongoing case review and/or legislation, contractual obligations, or best practice.

8. Jargon buster definitions

Term	Description
<i>Significant Harm</i>	the threshold that justifies compulsory intervention into family life in the best interests of the child or young person
<i>Abuse/Domestic Abuse</i>	treatment of an individual's human and civil rights by any other person or persons and may consist of single or repeated acts
Physical abuse	causing physical harm to a child, young person or vulnerable adult
Emotional/Psychological	persistent emotional ill-treatment of a child, young person or vulnerable adult
Sexual	rape, sexual assault or sexual acts occurring through force or enticement and which a child, young person or vulnerable adult could not have consented to, or to which they were pressurised into consenting.
Neglect or Acts of Omission	persistent failure to meet a child, young person or vulnerable adult's basic physical and/or psycho-social needs
Financial or Material	theft, fraud, and exploitation, pressure in connection with money or material possessions
Discriminatory	abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or sexual orientation
Abuse of Trust	an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual.
Radicalisation	The process by which a person comes to support terrorism and forms of extremism leading to terrorism
Online Abuse	any type of abuse that happens on the web, whether through social networks, playing games online or using mobile phones
Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE):	forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Harmful Sexual Behaviour	Sexual actions by young people that are developmentally inappropriate, harmful to themselves or abusive towards others
Female Genital Mutilation:	the total or partial removal of the external female genitalia for non-medical reasons
Honour Based Abuse :	encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing
Gender Questioning	the process of exploring or being unsure about one's gender identity
Child trafficking:	abuse where children are recruited, moved or transported and then exploited, forced to work or sold
County Lines	drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns
Child on child abuse	Children can abuse other children and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting (also known as Youth Produced Sexual Imagery) and initiating/hazing type violence and rituals (KCSIE).
adult at risk	is an individual aged 18 years and over who: (a) has needs for care and support (whether or not the local authority is meeting any of those needs) AND; (b) is experiencing, or at risk of, abuse or neglect, AND; as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
KCSIE	Keeping Children Safe in Education – legislation updated annually

Note – the above list is intended to share common terms used within safeguarding. A fuller definition list is shared in Appendix one.

9. Appendices

Safeguarding Children and Young People in our education services Policy and Procedure – to be read in conjunction with this policy.

Appendix one – detailed definitions

Appendix One

Detailed definitions

Significant Harm

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989). Our Safeguarding Policy promotes the welfare of a young person who is suffering, or likely to suffer significant harm. The Act also gives powers to the Police to take emergency action to protect a young person from significant harm.

Abuse

“Abuse” relates to the mistreatment of an individual’s human and civil rights by any other person or persons and may consist of single or repeated acts. Incidents of abuse can be either to one person or more than one person at a time. Abuse and/or harmful behaviours can be either deliberate or the result of negligence, ignorance, lack of training, knowledge or understanding. Somebody may abuse or neglect an individual by inflicting harm or by failing to prevent harm.

Everyone should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another (KCSIE). Everyone should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of the classroom.

Everyone, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence (KCSIE).

Everyone should be aware that abuse does happen and that where there are any concerns, no matter if they appear low level – they should be reported to the safeguarding team. Keeping children safe in education - GOV.UK (www.gov.uk)

Within the context of this policy abuse and harmful behaviours are defined through the following main categories:

- Physical: this may involve hitting, slapping, pushing, kicking, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, misuse of medication, inflicting inappropriate physical sanctions, or otherwise causing physical harm to a child, young person or vulnerable adult including fabricating the symptoms of, or deliberately causing the individual ill health (DfE 2014, DoH 2000).
- Emotional/Psychological: this is the persistent emotional ill-treatment of a child, young person or vulnerable adult such as to cause severe and persistent adverse effects on their emotional development. This may involve the imposition of age or developmentally inappropriate expectations resulting in fear, exploitation or corruption. This may also include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Threats of harm or abandonment; humiliation; blaming; belittling; name-calling; persistent criticism; intimidation; coercion; harassment; verbal abuse, bullying (including cyberbullying) and being prevented from receiving

services or support are all forms of emotional abuse (DoH 2000). Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- Sexual: such as rape or penetration with an object, sexual assault or sexual acts occurring through force or enticement and which a child, young person or vulnerable adult could not have consented to, or to which they were pressurised into consenting. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities such as involving the child, young person or vulnerable adult in looking at, or in the production of, pornographic material, watching sexual activities or encouraging them to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. (DoH 2000).
- Neglect or Acts of Omission: this includes the persistent failure to meet a child, young person or vulnerable adult's basic physical and/or psycho-social needs, and which are likely to result in a serious impairment of the individual's health or development. This may include failing to provide adequate food, shelter and clothing, or educational services and/or neglect of, or unresponsiveness to, a child, young person or vulnerable adult's basic emotional needs (DoH 2000).
- Financial or Material: this may include theft, fraud, and exploitation, pressure in connection with money or material possessions. This may also include loss of jewellery or personal property, loss of money from a wallet or purse (DoH 2000).
- Discriminatory: this may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race, sexual orientation and gender reassignment. (DoH 2000).
- Abuse of Trust: under the Sexual Offenders Act 2003 it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This includes teaching and a range of support staff within educational establishments.
- Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism (Prevent Strategy.Gov.uk).
- Online Abuse: any type of abuse that happens on the web, whether through social networks, playing games online or using mobile phones (NSPCC 2015) The college uses an appropriate filter and monitoring system in place, which both learners and staff cohorts are aware of. We have a whole group approach to online safety where learners and staff are regularly updated about processes in place. Where learners have been asked to work from home, they have been provided with advice and guidance around online safety. Refer to Online safety policy.
- Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. This can be a one-

off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online (KCSIE).

- **Harmful Sexual Behaviour:** sexual actions by children or young people under 18 that are developmentally inappropriate, harmful to themselves, or abusive toward others. It encompasses a broad continuum ranging from inappropriate boundaries to physical violence, and can occur both in-person and online.
- **Female Genital Mutilation:** FGM is the total or partial removal of the external female genitalia for non-medical reasons (NSPCC 2015). Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police (KCSIE).
- **Honour Based Abuse:** So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take (KCSIE).
- **Gender Questioning:** the process of exploring or being unsure about one's gender identity. When someone is going through the process of working if their assigned sex at birth matches who they are, or if a different gender identity (like being transgender, nonbinary, or gender-diverse) fits them better.
- **Domestic abuse:** witnessing domestic abuse is child abuse, Teenagers can suffer domestic abuse in their relationships (NSPCC 2015).
- **Child trafficking:** Is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold (NSPCC 2015)
- **County Lines Criminal exploitation of children** is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns (KCSIE).
- **Child on child abuse** - Children can abuse other children and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting (also known as Youth Produced Sexual Imagery) and initiating/hazing type violence and rituals (KCSIE).
- **Homelessness Indicators** that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property (KCSIE).
- **Sexual violence and sexual harassment between children in schools and colleges** Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children (KCSIE).

- Up skirting The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim (KCSIE).
- Serious Violence – everyone should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs (KCSIE).

Adult at risk

Care Act 2014 defines an **adult at risk** is an individual aged 18 years and over who: (a) has needs for care and support (whether or not the local authority is meeting any of those needs) AND; (b) is experiencing, or at risk of, abuse or neglect, AND; as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an “adult at risk” is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) we use the following indicators to identify an adult who is, or may become “at risk” whilst they are registered with us:

- The individual is or may be in need of community care services by reason of mental or other disability, age or illness;
- Is or may be unable to take care of himself or herself.
- Is unable to protect himself or herself against significant harm or serious exploitation.

Whilst not definitive, the main categories of people covered by the definition of “adult at risk” include those who:

- have a learning disability
- have a physical or sensory impairment
- have a mental illness including dementia
- are old and frail
- are detained in custody or under a probation order
- are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker)

Wellbeing

Wellbeing is a broad concept, and it is described as relating to the following areas in particular: personal dignity; physical and mental health and emotional wellbeing; protection from abuse and neglect; control by the individual over day-to-day life;

participation in work, education, training or recreation; social and economic wellbeing; domestic, family and personal; suitability of living accommodation; the individual's contribution to society. The individual aspects of wellbeing or outcomes are those which are set out in the Care Act 2014, and are most relevant to people with care and support needs and carers. There is no hierarchy, and all should be considered of equal importance when considering wellbeing in the round.