

Safeguarding of Vulnerable Persons

Policy and Procedures

Quality Assurance Benchmarking		
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POLICY STATEMENT

West Dean College is committed to practices that protect Vulnerable Persons from abuse, exploitation, bullying, neglect and harm. This policy also covers the responsibility to protect and prevent students from radicalisation and extremism in response to the Prevent Duty requirements.

West Dean College ensures the Board of Trustees, management and staff recognise and accept their responsibility to develop the awareness of the risks and issues involved in safeguarding and are clear on how to identify and report any incidents.

The College is committed to working with local safeguarding organisations, such as the local authorities, Channel, Prevent coordinators and other community & referral groups to ensure the safeguarding of all persons.

The definition of vulnerable persons includes (but is not exclusive to) individuals with any of the following:

- Young Person (16-17 year olds)
- Learning Difficulties
- Physical Impairments
- Sensory Impairments
- Mental Health Needs
- Age Related frailty
- Dementia
- Brain Injuries
- Drug or Alcohol Problems

The College will refer concerns that a vulnerable person might be at risk of significant harm to the appropriate local authority, the police or in cases of radicalisation to the Channel Scheme.

All staff working with vulnerable persons will receive training adequate to familiarise them with relevant protection issues and their responsibilities and the College's procedures and policies, with refresher training at least every three years.

1. Definitions of Abuse

The College recognises the following as definitions of abuse:

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or otherwise causing physical harm. Physical injury may occur as a result of injury inflicted by a family member, including a brother or sister, or by another person, or an injury sustained accidentally but as a result of neglect. Physical harm may also

be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a person whom they are looking after. This situation is commonly described using terms such as fabricated or induced illness by proxy, or Munchausen syndrome by proxy.

Bullying can also be a form of physical and emotional abuse. However, it is more often between peers and needs to be dealt with locally by personal tutors with the assistance of Student Services, with cases reported as per the College Anti Bullying & Harassment Policy.

- **Psychological/Emotional** abuse is the persistent emotional ill-treatment of a person such as to cause severe and persistent adverse effects on him or her emotional development. It may involve conveying to that person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the person concerned. It may involve causing that person to feel frightened or in danger, or exploitation or corruption. Emotional and other forms of abuse may occur as a result of domestic violence. Some level of emotional abuse is involved in all types of ill-treatment or abuse, though it may occur alone.
- **Sexual abuse** involves forcing or enticing a vulnerable person to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activity such as involving vulnerable persons in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and phone images.
- **Neglect** is the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, or the failure to ensure access to appropriate medical care or treatment. It may also involve the neglect of basic emotional needs.

In respect to vulnerable persons, the college also recognises the following forms of abuse:

- **Financial abuse** is defined as the misappropriation of money or assets; transactions to which the person could not consent or which were invalidated by intimidation or deception; or, the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and unreasonable restriction on a person's right to control over their lives to the best of their ability.

- **Discriminatory abuse** is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation, etc.
- **Institutional abuse** is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of the providers rather than the person requiring the service.

In respect of safeguarding individuals from radicalisation, the College works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for students through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

2. Safeguarding staff and structures

- 2.1 The Principal supported by the Academic Registrar and the Human Resources Business Partner, has overall responsibility for Safeguarding and for any disciplinary actions arising from allegations made against students or staff.
- 2.2 The Duty House Officers and Academic Registry hold the emergency contact details for the Academic Registrar and Principal.
- 2.3 Key personnel and local authorities will need to demonstrate that they are protecting vulnerable persons from being drawn into terrorism by having robust safeguarding policies in place to identify people at risk, and intervening as appropriate. The College will need to consider the level of risk to identify the most appropriate referral, which could include Channel. These policies should set out clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised.

3. Recognising abuse

- 3.1 Staff and students who may be working with vulnerable persons and engaged in activities provided by the College or in other contexts, need to remain aware of the signs of abuse to be able to respond appropriately.

Abuse can happen within a person's family and in institutional or community settings. Some individuals seek to use voluntary and community organisations to gain access to vulnerable

adults, and it is necessary to have an open mind when the possibility arises that a person has suffered abuse or a member of the College is suspected of abuse or inappropriate activity. The following may indicate that a person is being or has been abused:

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally.
- An injury for which the explanation appears inconsistent.
- The person describes an abusive act or situation.
- Unexplained changes in behaviour.
- Inappropriate sexual awareness or sexually explicit behaviour.
- The person appears distrustful of adults.
- The person is not allowed to be involved in normal social activities.
- The person becomes increasingly dirty or shabby.

3.2 The recognition of abuse is not always easy and the College acknowledges that its staff and students may not be experienced in this area and will not easily know whether or not abuse is taking place. Indeed, it is not the place of College staff to make such a judgement. However, it is their responsibility to act on concerns in order to safeguard the welfare of the vulnerable person. It is for this reason that the College has designated key staff to respond to concerns.

4. Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual becomes increasingly intolerant of more moderate views
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.
- The individual expresses a desire/intent to take part in or support extremist activity

5. Taking action

5.1 Members of the College are encouraged to discuss any concerns with the Academic Registrar. If those concerns relate to a nominated member of staff, then the Principal should be notified in the first instance. If an individual feels that the College has not responded appropriately, then they are free to contact Social Services or other agencies.

- 5.2 Every effort should be made to maintain confidentiality. Suspicions **must not** be discussed with other than those nominated above. If the Academic Registrar is not available then individuals should not delay and should contact the Principal.
- 5.3 The Principal or the Academic Registrar has the responsibility to act on behalf of the College in dealing with allegations or suspicion of abuse or neglect and for referring the matter to the appropriate statutory authorities. The nominated members of staff are responsible for collating details of the allegation or suspicion. It is the task of Social Services, not the College, to investigate the matter.
- 5.4 Under no circumstances should members of the College carry out their own investigation into suspicions or allegations of abuse, neither should they question students closely, as to do so may distort any investigation that may be carried out subsequently by the Police or Social Services.
- 5.5 If a student says something or acts in such a way that abuse is suspected, the person receiving the information should:
- React in a calm but concerned way.
 - Tell the student that s/he is right to share what has happened; and that s/he is not responsible for what has happened.
 - Take what the student says seriously.
 - Keep questions to an absolute minimum only to clarify what the student is saying; not to interrogate.
 - Do not interrupt the student when they are recalling significant events.
 - Reassure the student that the problem can be dealt with.
 - Do not give assurances of confidentiality which cannot be kept but reassure the student that the information will only be passed on to those people who need to know.
 - Make a full record of what is said and done, though this should not result in a delay in reporting the problem.
- 5.6 The record should include:
- A verbatim record of the student's disclosure. This may be used later in a criminal trial and it is vital that what the student discloses is recorded as accurately as possible.

Therefore, the record must be drafted in the student's words and should not include the assumptions or opinions of others.

- The nature of the allegation or concern.
- A description of any visible physical injury (clothing should not be removed to inspect the student).
- The student's account of what has occurred.
- Any dates, times or places and any other potentially useful information.

A pro-forma incident report form is attached in Appendix I

5.7 The problem should be reported IMMEDIATELY to one of the College's designated members of staff who will take the appropriate action. Advice can also be sought from the NSPCC 24 hour helpline on 0800 800 5000, the Police on 999 or 101 or from West Sussex County Council on 01243 642121.

5.8 It is recognised that staff may need support after receiving a disclosure from a vulnerable adult and will be offered appropriate counselling.

6. Incidents that MUST be reported/recorded

If any of the following occur you should report this immediately to a nominated member of staff:

- If you accidentally hurt a student.
- If he/she seems distressed in any way.
- If a student appears to be sexually aroused by your actions.
- If you are concerned that a relationship is developing that could represent an abuse of trust.
- If you are concerned that the student is becoming attracted to you.
- If you are concerned that a colleague is becoming attracted to someone in his/her care.
- If a student misunderstands or misinterprets something you have done.
- If a student expresses radical or extremist views and opinions.
- If you have had to use reasonable physical restraint to prevent a student harming themselves, or another, or from causing significant damage to property.
- If a student reports an allegation of abuse regarding a member of an external organisation using College facilities.

7. Procedure for dealing with allegations or suspicion of abuse

7.1 Against a member of the College at work

- 7.1.1 This can be an extremely difficult issue to deal with. It can be difficult to accept that a colleague may deliberately harm a vulnerable student. It may also be that the behaviour that causes concern is bad practice rather than abuse. When a concern arises, there are three processes that may need to take place. These are:
- A Safeguarding investigation.
 - A criminal investigation.
 - Action by the College to discipline or remove the member of the College.
- 7.1.2 It is important that these are properly co-ordinated and that events are managed in the right order. For this reason, the College will take no direct action against a member of the College without the advice and agreement of the investigating agencies (e.g. the police or Social Services), except where such action is necessary to protect a vulnerable student.
- 7.1.3 If, following consideration and any consultation, the concern clearly is about bad practice rather than abuse, the nominated members of staff will notify the Director of Education who will take the necessary action to advise, manage or instigate disciplinary action against the member of the College about whom the allegation has been made.
- 7.1.4 Irrespective of the outcome of the Police and Social Services investigations, the College may consider suspension and/or disciplinary action in accordance with its usual disciplinary procedure.
- 7.1.5 Suspicion of abuse involving designated members of staff must be referred in the first instance to the Principal.

8. Minimising Risk

- 8.1 All members of the College should be encouraged to demonstrate exemplary behaviour when working with vulnerable persons in order to protect adults from abuse and themselves from false allegations.

ANNEX I

INCIDENT REPORT FORM			
Name of vulnerable person (first name and surname):			
Nature of allegation or concern - What was seen, said or alleged to have taken place:			
When was this alleged to have happened? Please record information as accurately as possible.	<u>Date(s):</u>	<u>Time(s):</u>	<u>Location(s):</u>
Names of those persons alleged to be involved. Note how they were alleged to be involved next to their name i.e. perpetrator, bystander	<u>Names</u> 1. 2. 3. 4. 5. 6.		<u>How involved</u>
Other relevant information.			
Name of person (s) reporting the incident			
Signature			
Date:			

ANNEX 2

Making a Channel referral

1. What is Channel?

- 1.1 'Channel' is a key element of the *Prevent* strategy.
- 1.2 Channel is the name for the process of identifying and referring a person at risk of radicalisation for early intervention and support. It is a multi-agency approach to protect vulnerable people using collaboration between local authorities, statutory partners (such as education and health organisations, social services, children's and youth services and offender management services), the police and the local community. Channel operates to:
 - Identify people at risk of being drawn into terrorism;
 - Assess the nature and extent of that risk; and
 - Develop the most appropriate support plan for the individuals concerned.
- 1.3 Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. Channel aims to safeguard children and adults of any faith, ethnicity or background before their vulnerabilities are exploited by those that would want them to embrace terrorism. The emphasis is on early intervention to protect and divert people away from the risk they face before being drawn into committing terrorist-related activity.
- 1.4 Channel operates in the 'pre-criminal' space. It is not suitable for an individual who you believe has – or is about to – commit a criminal offence, this should be reported to the police. A referral to Channel will not result in an emergency response.

2. Who to contact if you have a concern

- 2.1 If you have any concerns about an individual possibly being drawn into or supporting terrorism, examine them first with your manager. If this is not possible, or if, having considered the case, you still believe there may be grounds for a Channel referral, contact any of the following to discuss the case:

For West Dean Students/Staff

Sussex Police Prevent Team:

Telephone 101 | Ext. 531355

Email: prevent@sussex.pnn.police.uk

Or

Local Channel Panel Chairs

For West Sussex:

Beverly Knight

Better Communities, WSCC

Telephone 0330 222 4223 | Mobile 0789 458 9071

Email: beverly.knight@westsussex.gov.uk

For KLC – Chelsea Harbour Students/Staff

Hammersmith Local Authority Prevent Team Contact

0208 7535727

prevent@lbhf.gov.uk

Head of Prevent (Royal Borough of Kensington and Chelsea)

pinakin.patel@lbhf.gov.uk

National Police Prevent Line 0800 011 3764

3. How to make a referral to Channel

- 3.1 Consult with any of the professionals above regarding the suitability of the referral. They can provide you with a 'Channel referral and assessment form' (see appendix A).
- 3.2 Complete the form and return it to the Channel Co-ordinator by email to: channel@sussex.pnn.police.uk. For the Design School contact prevent@lbhf.gov.uk
- 3.3 The Police Channel Practitioner will then complete an extensive risk assessment. At no point will the person be created on the criminal records system, but a local intelligence report will be created.
- 3.4 The Police Counter Terrorism Intelligence Unit will also complete a case summary which is returned to the Prevent Engagement Officer and the referrer.

4. Consent

- 4.1 Participation in Channel is voluntary and requires consent to be given by the individual (or their parent or guardian in the case of anyone under 18) in advance of support measures being put in place.
- 4.2 All individuals who receive support through Channel must be made aware that they are receiving this as part of a programme to protect people from being drawn into terrorism and what to expect.

- 4.3 Where someone does not wish to continue with the process it may be appropriate to provide alternative support through other mainstream services.
- 4.4 Individuals (or their parent/guardian) must give their consent before any information is shared about them as part of the Channel programme.
- 4.5 If there are any issues with consent, i.e. it is not (or unlikely to be) given, discuss this with any of the individuals named at 2.1.

5. The Channel panel

- 5.1 The role of the Channel panel is to develop an appropriate support package to safeguard those at risk of being drawn into terrorism based on an assessment of their vulnerability.
- 5.2 Channel assesses vulnerability using a consistently applied vulnerability assessment framework, built around an individual's engagement with an ideology or cause; their intent to cause harm and capability to cause harm.
- 5.3 The panel is responsible for managing the safeguarding risk, in-line with other multi-agency panels where risk is managed, such as Children and Adult Safeguarding panels and Multi-Agency Public Protection Arrangements (MAPPA).
- 5.4 For Crawley cases, the panel will be chaired by Crawley Borough Council, and for the rest of West Sussex, West Sussex County Council. Other panel members will include the Channel Police Practitioner and any other relevant statutory partners, depending on the nature of the referral. The following agencies now have a statutory duty to co-operate with the panel and the police:
- NHS staff
 - Social care staff, including Directors of Children's and Adults' Services
 - Schools, further education colleges and universities
 - Youth Offending Services
 - Chairs of Local Safeguarding Children Boards and Safeguarding Adults Boards
 - Local Authority Safeguarding Managers
 - Home Office Immigration
 - Border Force
 - Housing
 - Prisons
 - Probation

- 5.5 The panels meet monthly as a minimum. Where significant information arises about a case which requires the panel to meet earlier than scheduled or more frequently, the Channel Panel Chair will convene additional panels.
- 5.6 Ownership of the safeguarding risk lies with the multi-agency Channel panel. This is the risk to an individual as a result of their vulnerability.
- 5.7 The Chair of the panel is responsible for ensuring that any safeguarding risks are referred to the most appropriate agencies for action; until this happens the Channel panel owns these risks.

The support for some individuals will span several agencies; each agency involved will own the element of risk they are responsible for addressing through the support plan.

- 5.8 Ownership of the risk of involvement in terrorism lies with the police. This is the risk posed by the individual to themselves and society through their potential active involvement in criminality associated with terrorism.

6. Support package and support plan

- 6.1 If the case is adopted onto Channel, the panel will develop a support package. This will be based on:
- A review of the vulnerability assessment completed by the Channel Police Practitioner at the preliminary assessment stage;
 - The needs of the individual; and
 - Any risks posed to potential support providers.
- 6.2 The type of activities included in a support package will depend on the individual's assessed risk, vulnerability and resources available. A diversionary activity may be sufficient for someone who is in the early stages of radicalisation to violence, whereas a more focussed and structured one-on-one mentoring programme may be required for those who are already becoming radicalised.
- 6.3 The following are examples of support programmes which may be considered:
- a. **Mentoring support contact** – work with a suitable adult as a role model or providing personal guidance, including guidance addressing extremist ideologies.

- b. **Life skills** – work on life skills or social skills generally, such as dealing with peer pressure.
- c. **Anger management session** – formal or informal work dealing with anger.
- d. **Cognitive/behavioural contact** – cognitive behavioural therapies and general work on attitudes and behaviours.
- e. **Constructive pursuits** – supervised or managed constructive leisure activities.
- f. **Education skills contact** – activities focused on education or training.
- g. **Careers contact** – activities focused on employment.
- h. **Family support contact** – activities aimed at supporting family and personal relationships, including formal parenting programmes.
- i. **Health awareness contact** – work aimed at assessing or addressing any physical or mental health issues
- j. **Housing support contact** – activities addressing living arrangements, accommodation provision or neighbourhood, and
- k. **Drugs and alcohol awareness** – substance misuse interventions.

6.4 Channel intervention providers engaging with these vulnerable individuals are first have been approved by the Home Office. This is particularly important where an individual has a need for theological/ideological support.

7. Reviewing risk

7.1 Individuals receiving support will be reassessed at least every 3 months.

If the panel is satisfied that the risk has been successfully reduced or managed they should recommend that the case exits the process, completing a closing report.

7.2 If the panel is not satisfied that the risk has been reduced or managed, the case will be reconsidered. A new action plan will be developed and alternative support put in place.

7.3 All cases are reviewed at 6 and 12 months from the point at which they exit the process, by the senior managers involved in the preliminary assessment.

Further information:

[Prevent Strategy](#)

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