Policy

Shaftesbury Education

September 2026

Safeguarding Adults Policy

This document relates to	
Shaftesbury Education	✓

© Copyright Shaftesbury

Shaftesbury Education

Contents

Introduction 5

Purpose of this Policy 5

What is Safeguarding? 6

Policy Statement 7

Principles 7

Trauma Informed Practice 8

Roles and Responsibilities 9

- Responsibilities of Shaftesbury's Trustees 9
- Responsibilities of the Designated Safeguarding Lead (DSL) – see job description 11
- Responsibilities of the Head of Setting 12

What is Abuse? 12

- General indicators of abuse 13
- Risk factors 14

Types of Abuse 15

- Physical abuse 15
- Emotional / Psychological abuse 16
- Sexual abuse 17
- Neglect 18
- Self Neglect 19
- Financial or material abuse 19
- Domestic abuse 20
- Organisational or institutional abuse 21
- Discriminatory abuse 22
- Bullying and cyberbullying 23
- Modern slavery 24

© Copyright Shaftesbury

Female genital mutilation 25
Forced Marriage 26
Cuckooing 26
Online Abuse 26
The Prevent Duty 27
Background 27
Protecting the people who use our services from the risk of radicalisation 28
Online Safety 29
Attendance and Safeguarding 31
Contextual Safeguarding 31
What to do when you have a Concern or a Student discloses Abuse or Neglect 32
Action to be taken by everyone 32
Action to be taken by the Designated Safeguarding Lead (DSL) 34
Action to be taken by the Registered Manager 36
Action to be taken by the Head of Setting 36
Escalation procedures 37
Consent 37
Mental Capacity Act (MCA) 38
Medication Administration Incidents 38
Supporting a Person who makes Repeated Allegations 39
When the Person Causing Harm has Care and Support Needs 39
Allegations against Staff 40
Managing allegations against staff 40
Duty to refer 42
Investigation outcomes 42

© Copyright Shaftesbury

Staff Conduct 43
Safer working practice 43
Low level concerns 43
Whistleblowing 44
Staff Training 44
Safer Recruitment 45
Recording Information 46
Sharing Information 47
Notifying parents/carers 47
Referrals 47
Confidentiality and sharing information 48
Duty of Candour 49
Reflections and Lessons Learnt 50
Implementation 50
Related Policies, Procedures and Protocols 51
Policy Ownership 53
Appendix A – Safeguarding Levels Criteria 54
Appendix A - Safeguarding Levels Criteria 54
Appendix B – Safeguarding Posters 54
Appendix B1 – Safeguarding Poster template 54
Appendix B2 – Local Safeguarding Posters 54

© Copyright Shaftesbury

Introduction

Shaftesbury is a disability charity offering care, education, vocational and rehab services. The charity also provides residential care, nursing and supported living.

Within the education sector, Shaftesbury has one school, Shaftesbury Victoria School, and 2 further education colleges, Shaftesbury Millie College and Shaftesbury Nash College. The school is for students aged 3-19, and the colleges are for students aged 16-25. All students have an Education, Health and Care Plan (EHCP), as well as physical and/or intellectual disabilities, and some have profound and complex learning needs.

The National Society for the Prevention of Cruelty to Children (NSPCC) Consultancy is commissioned annually to review the Safeguarding Children Policy, the Safeguarding Adults Policy and the Safeguarding Reporting Procedure. This document has been produced as a result of the recommendations.

Purpose of this Policy

The purpose of this policy is:

- To provide guidance to all staff for the safeguarding and protection of adults.
- To ensure a consistent approach to responding to allegations and/or concerns about the abuse or neglect of adults.
- To ensure that the organisation fulfils its obligations under the Care Act 2014.

This policy is based on principles from the Care Act 2014, the Education Act 2002, and Keeping Children Safe in Education 2026 (KCSIE) guidance.

The Safeguarding Adults Policy complements and should be used in conjunction with the relevant Local Authority (LA) Adult Safeguarding protocol and operating procedures for the setting where the service is provided.

All staff must adhere to this policy without discretion. It applies whenever staff work with students, including all off-site activities such as visits, trips, and sporting events.

This policy also applies to all volunteers, agency and temporary staff, contractors, and visitors at Shaftesbury Education settings.

Shaftesbury also has in place a Safeguarding Children Policy which should be used by any member of staff or volunteer who has a concern about a child with whom they come into contact with through the course of their work.

© Copyright Shaftesbury

What is Safeguarding?

Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. It is fundamental to high-quality health, social care and education. At Shaftesbury our aim is to safeguard adults by working with them in a way that supports them to make choices and have control over how they want to live.

The Care Act 2014 brought in a range of changes to care and support for adults, intended to put individuals in control of the help that they receive and to make care and support clearer, easier to access and more consistent across the whole of England. In addition, Section 42 of The Act sets out the responsibilities of LA Safeguarding Adults Boards and care and support providers for safeguarding. The LA board develops policies and procedures that all partners sign up to and agree to implement. It's also required to investigate, or ensure others do so, if it believes that an adult is experiencing, or is at risk of, abuse or neglect. This means that the board could ask Shaftesbury to support or make enquiries if abuse or neglect is reported within Shaftesbury's service, although the local authority retains overall responsibility.

Safeguarding duties apply in relation to any adult at risk. As defined by the Care Act, an adult at risk is: an individual aged 18 years and over, who:

a. has needs for care and support (whether or not the LA is meeting any of those needs) AND;

b. is experiencing, or at risk of, abuse or neglect, AND;

c. 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.

Safeguarding adults includes:

- Protecting their rights to live in safety, free from abuse and neglect.
- People and organisations working together to prevent the risk of abuse or neglect, and to stop abuse or neglect from happening.
- Making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account.

When abuse occurs, it is not always immediately recognised and its impact is sometimes underplayed. It is possible to reduce the risk of harm or abuse with appropriately planned care, support and intervention. This policy affirms Shaftesbury's commitment to promoting the welfare and safety of adults that use its services in line with their individual rights.

The welfare of the individual is paramount regardless of the situation - the most important consideration is whether the person is safe. If the person may be in immediate danger, staff should contact emergency services without delay, including the police where a crime has been committed or suspected.

© Copyright Shaftesbury

Policy Statement

Shaftesbury Education is dedicated to safeguarding all students, ensuring they feel secure and valued. Every student, regardless of background, has the right to protection from harm and abuse. We recognise the additional vulnerabilities of some adults arising from their communication needs, dependency on others for personal care, and previous experience of abuse or neglect.

Staff play a crucial role in identifying signs of abuse. Comprehensive safeguarding training is provided during induction and regularly updated to maintain vigilance. Staff are required to follow reporting procedures and familiarise themselves with Part 1 of Keeping Children Safe in Education, which outlines key safeguarding issues.

This policy is crucial to our commitment to safeguarding and promoting the welfare of adults. We work in partnership with parents and carers, multi-agency teams and departments, and our communities to continuously enhance the safeguarding culture within our schools and colleges. We work with statutory organisations to ensure that all reported incidents are investigated fully.

We recognise that safeguarding is everyone's responsibility.

Principles

The Care Act introduced a set of key principles, which underpin all adult safeguarding concerns and are adopted as the overarching principles by which Shaftesbury fulfils its responsibilities under the Act. These are:

- **Empowerment** – the presumption of person-led decisions and informed consent. The affected person should be asked what outcome they want from the safeguarding process and this should directly inform what happens.
- **Prevention** – It is better to take action before harm occurs. All those who may be involved must have clear information about what abuse is, how to recognise the signs and what do to get help.
- **Proportionality** – the measures implemented must be in the best interests of the individual and the least intrusive response appropriate to the risk presented.
- **Protection** – planned care and support for the most vulnerable to ensure that risk is managed appropriately; that they can report abuse and take part in the safeguarding process to the extent to which they want and are able.
- **Partnership** – staff treat sensitive information in confidence, only sharing what is helpful and necessary and working in partnership with other agencies to get the best result for each individual.

© Copyright Shaftesbury

- **Accountability** – all involved receive the training and support required to understand and carry out their respective roles in the safeguarding process.

Shaftesbury ensures that these principles are at the centre of its safeguarding practice by:

- Being committed to promoting well being, safety, rights and dignity of adults we work with;
- Following statutory guidance and working with Safeguarding Adults Boards;
- Commitment to involving individuals in decisions about their safety and supporting them to achieve their desired outcomes;
- Commitment to preventing abuse and neglect and responding promptly and proportionately when concerns arise.
- Recognition that safeguarding is everyone's responsibility and requires collaboration with local authorities, police, health services, families, advocates, and other partners.
- Clear expectation that all safeguarding concerns will be reported, recorded, and referred appropriately.

Trauma Informed Practice

Trauma-informed practice develops from the understanding of how trauma exposure can affect our neurological, biological, psychological and social development. It is founded on the understanding and acceptance that symptoms and experiences related to trauma are coping strategies established by people to manage traumatic experiences. Trauma-informed practice seeks to avoid re-traumatisation by using the principles of safety, trustworthiness, choice, collaboration, empowerment and cultural consideration.

Shaftesbury recognises that trauma-informed practice is an essential element of practice within safeguarding and is one which should be recognised in order to ensure that students are protected from further harm and re-traumatisation. Understanding the impact traumatic experiences have within the context of safeguarding enables Shaftesbury and other partners to tailor our interventions to the individual needs of students. The aim is to support students to develop trust and feel safe and empowered in their interactions with Shaftesbury and other agencies involved in safeguarding.

There is a natural crossover with trauma-informed practice and the principles of adult safeguarding and also the approaches and practice outline in Making Safeguarding Personal (Association of Directors of Adult Social Services, 2014). Both of these approaches ensure that the student is at the centre of our practice and is enabled to make choices and be the expert of their own care, support and safety planning. This should be evident in Local Protocols.

© Copyright Shaftesbury

Roles and Responsibilities

Safeguarding is everyone's responsibility; every member of staff plus Trustees and members of the Local Advisory Board should:

- Protect students from abuse.
- Be aware of Shaftesbury's safeguarding policies, procedures and protocols.
- Know how to access and implement safeguarding policies.
- Follow local protocols at all times.
- Know the identity of the Designated Safeguarding Lead (DSL) and to whom one should speak in the absence of the DSL.
- Report all safeguarding concerns to the DSL.
- Keep a record of any significant safeguarding concern, conversation or incident.
- Undertake appropriate training, including refresher training every year.

In addition, some postholders have specific responsibilities as highlighted below:

Responsibilities of Shaftesbury's Trustees

The Charity Commission requires that Trustees have overall responsibility for the protection of beneficiaries and others who come into contact with the charity from harm and abuse and expects Trustees to have the requisite knowledge, skills and expertise to do so effectively and responsibly. The Trustees are supported in this by the Head of Governance.

Trustees must ensure the following: The Board of Trustees has collective responsibility for ensuring effective safeguarding arrangements across Shaftesbury. In fulfilling this responsibility, Trustees will ensure that:

- All serious incidents are reported to the Charity Commission.
- A member of the Executive Leadership Team is designated as Executive Safeguarding Lead and is responsible for ensuring safeguarding arrangements, including responses to safeguarding concerns are compliant with statutory responsibilities including the Prevent Duty .
- Safeguarding concerns and decision-making are overseen by suitably qualified DSLs.
- Clear structures are in place to enable staff, volunteers and visitors to report concerns.

© Copyright Shaftesbury

- Incidents and allegations are logged, tracked, and monitored, with data regularly shared with management and trustees.
- Support is provided for staff working with individuals affected by abuse.
- Safer recruitment practices are implemented to mitigate risks from employees. See the Recruitment and Selection Policy.
- Staff receive supervision and training to identify abuse and neglect.
- A code of conduct sets standards for personal relationships for those in positions of trust.
- Accessible information guides staff and visitors on reporting concerns.
- Staff, students and visitors have easy access to information on how to voice concerns or complaints about the service, both internally and to external bodies.
- A whistleblowing policy supports reporting of bad practices.
- Disciplinary procedures address neglect or abuse by staff.
- Notifications are made to the Disclosure and Barring Service (DBS) when necessary.
- Safeguarding records are accurate, clear, and up-to-date.
- Service contracts and specifications align with safeguarding policies.
- An internal safeguarding board comprised of Trustees and Executive Directors reviews serious cases, trends, and lessons learned.
- A range of managers are involved in safeguarding decisions and are advised on learning and development opportunities from cases reviewed.
- Audits of the Sign-In Central Record (SICR) are reported to the Trustees via the Director for Education.

The Chair of the Safeguarding and Services Quality Committee has overall responsibility for safeguarding. The Board of Trustees retains collective responsibility for safeguarding. The Chair of the Safeguarding and Services Quality Committee provides strategic oversight and assurance to the Board regarding safeguarding arrangements.

© Copyright Shaftesbury

Responsibilities of the Designated Safeguarding Lead (DSL) – see job description

All settings must have a Designated Safeguarding Lead (DSL) available at all times. Typically, this role is held by a senior leader, registered manager, Deputy Head, or Head of Setting. The DSL advises, supports, and guides staff on safeguarding concerns and links with local authorities and police.

DSLs receive specialised training and meet periodically with deputies and safeguarding leads from other settings. Their responsibilities include, but are not limited to:

- Ensuring the safety of all students.
- Collating information and securing forensic evidence for concerns.
- Informing the Head of Setting and Director for Education about significant issues.
- Contacting local authorities and coordinating action plans, including police involvement if needed.
- Recording actions in the Child Protection Online Management System (CPOMS), per reporting protocols.
- Notifying regulatory bodies for Care Quality Commission (CQC) registered services within 24 hours.
- Communicating with commissioning authorities and relevant social workers.
- Contacting the police if a student's safety is at immediate risk.
- Managing referrals to LA social care, the Channel programme and DBS, as required.
- Providing support to staff and sharing knowledge and skills.
- Understanding the views of students, encouraging a culture of listening and acknowledging the difficulties students may have in approaching staff.
- Holding detailed, accurate, secure written records of all safeguarding concerns, discussions and decisions, including the rationale for decisions.
- Ensuring student safeguarding files are kept up to date and where information is shared it is line with KCSIE guidelines.

The DSL's role is described in detail: Keeping Children Safe in Education (2026) Annex B.

© Copyright Shaftesbury

Responsibilities of the Head of Setting

The Head of Setting (who may be the Headteacher, Principal or Head of College) is responsible for:

- Overseeing the effectiveness of safeguarding responses, reports, action plans, and investigations
- Ensuring the DSL has the time and resources to carry out their role effectively
- Reviewing safeguarding outcomes and recommending changes to protocols and staffing if needed
- With the DSL, proposing case closures to the Education Safeguarding Team for complex cases.

What is Abuse?

All staff need to recognise the signs and indicators of abuse. While it is not always possible to be certain that abuse has occurred or is occurring, staff should report any concerns, however small, to the DSL.

KCSIE 2026 defines abuse as:

> "a form of maltreatment of a [student]. Somebody may abuse or neglect a [student] by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on [students] of all forms of domestic abuse, including where they see, hear or experience its effects. [Students] may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. [Students] may be abused by… another [student] or [students]."

In addition, staff should understand that harm can occur inside and outside school or college, inside and outside the student's home, and online. Incidents of abuse, neglect and exploitation are rarely standalone events and multiple issues can overlap.

The term "potential source of risk" may include relatives, professional staff, paid care workers, volunteers, other people who use services, neighbours, friends, associates, and strangers. It applies regardless of whether the abuse was intentional or unintentional.

We take seriously any reports of non-recent abuse, reporting concerns to the police as necessary, and cooperating with any investigation.

© Copyright Shaftesbury

Abuse and neglect can take many forms and may occur once or repeatedly. They can be deliberate or unintentional and may result from acts of omission as well as acts of commission. Abuse can take place in any setting, including a person's own home, a care setting, hospital, workplace, educational setting or in the community. Care Act 2014 - Explanatory Notes

It is not our responsibility to decide whether or not abuse has taken place. Shaftesbury has a responsibility to inform if we believe there is cause for concern, so that the appropriate agencies can investigate and take any necessary action to protect the individual concerned. Any suspicion, allegation or incidence of abuse must be reported to the DSL immediately, who will then decide, in consultation with others as necessary, whether to make a referral to the relevant LA Safeguarding Team. DSLs and Head of Settings should be aware of the different procedures for children and adults, as referenced in local protocols.

General indicators of abuse

People experiencing abuse often experience more than one type of abuse over a period of time. People who experience abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend.

Many of the signs that a person is being abused are the same regardless of the type of abuse. Anyone working with adults at risk needs to be able to recognise the signs.

The following may be indicators of abuse:

- Seeking shelter or protection.
- Unexplained reactions towards particular individuals or settings.
- Frequent or regular visits to the general practitioner or the accident and emergency department, or hospital admissions.
- Frequent or irrational refusal to accept investigations or treatments for routine difficulties.
- Unexplained change in material circumstances.
- Inconsistency of explanation regarding the area of possible concern.
- Carer/care worker or third party always wishing to be present at interviews.
- Anorexia/bulimia or eating disorders.
- Panic attacks, withdrawal of verbal communication, regressive behaviour.
- Disturbed sleep patterns.

© Copyright Shaftesbury

- Absconding/wandering.
- Dislike of being touched and flinching on being touched.
- Obsessive or challenging behaviour.
- Self-harm.
- Withdrawal.
- History of domestic violence.

Although none of the above indicators definitively suggest abuse, and these signs do not necessarily mean an adult is being abused, suspicions should be heightened if one or more of these factors exist. Where people experience barriers to communication and understanding, it is even more important for staff to be aware of any behavioural changes.

It is not the role of staff to decide whether or not abuse has taken, or is taking, place, but if they have any concerns they should report it to the DSL, following Shaftesbury's safeguarding procedures.

Risk factors

There are certain factors and situations that may place people at particular risk of being abused. The presence of one or more of these factors does not automatically imply that abuse will result, but may increase the likelihood:

- Physical and cognitive disabilities – for example, where a person needs assistance in managing urinary and/or faecal continence.
- Mental health issues or social isolation – experienced by the person themselves or by a member of their household.
- Dependency on family or carers, or where someone else is dependent on them.
- Cultural and language barriers – such as differences in communication.
- Financial dependency, the existence of financial problems, or readily available assets.
- Environmental factors – this could include inappropriate or dangerous physical or emotional environments (such as a lack of personal space) or a change in the lifestyle of a member of their household (for example, due to unemployment or illness).
- Previous experience of abuse, a family history of abuse, or living in the same household as a known abuser.

© Copyright Shaftesbury

Types of Abuse

Physical abuse

What is physical abuse?

Physical abuse may involve assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable (e.g. opening a window and removing blankets), involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding or withholding food, unauthorised restraint or restricting movement (e.g. tying someone to a chair).

Spotting the signs of physical abuse

People often have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern.

Injuries that are more likely to indicate physical abuse include:

Bruising

- bruises on the cheeks, ears, palms, arms and feet
- bruises on the back, buttocks, tummy, hips and backs of legs
- multiple bruises in clusters, usually on the upper arms or outer thighs
- bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe
- large oval-shaped bite marks

Burns or scalds

- any burns which have a clear shape of an object, for example cigarette burns
- burns to the backs of hands, feet, legs, genitals or buttocks

Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times. If someone is frequently injured, and if bruises or injuries are unexplained or the explanation does not match the injury, this should be investigated. Delays in seeking medical help for someone who has been injured should also be investigated.

© Copyright Shaftesbury

Emotional / Psychological abuse

What is emotional abuse?

Emotional abuse, also known as psychological abuse, is the persistent emotional maltreatment of a person to cause severe and persistent adverse effects on their emotional wellbeing.

Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Emotional abuse involves:

- humiliating, putting down or regularly criticising someone
- shouting at or threatening someone or calling them names
- mocking someone or making them perform degrading acts
- constantly blaming or scapegoating someone for things which are not their fault
- trying to control someone's life and not recognising their individuality
- not allowing someone to have friends or develop socially
- pushing someone too hard or not recognising their limitations
- manipulating someone
- addressing a person in a patronising or infantilising way
- exposing someone to distressing events or interactions
- persistently ignoring someone
- leaving someone unattended when they need assistance
- preventing someone from meeting their religious and cultural needs
- preventing the expression of choice and opinion
- failure to respect privacy
- preventing someone from accessing services or educational and social opportunities
- removing mobility or communication aids
- being cold and emotionally unavailable during interactions with the person
- not being positive or encouraging to the person or praising their achievements and successes.

© Copyright Shaftesbury

Spotting the signs of emotional abuse

There usually are not any obvious physical signs of emotional abuse, but you may spot changes in a person's actions or emotions. Some people are naturally quiet and self-contained while others are more open and affectionate. Mood swings and challenging behaviour are also normal for many of our students. Be alert to behaviours which appear to be out of character for the individual or are particularly unusual.

Sexual abuse

What is sexual abuse?

Sexual abuse is forcing or enticing someone to take part in sexual activities. It does not necessarily involve violence and the person may not be aware that what is happening is abuse. Sexual abuse can involve contact abuse and non-contact abuse. Contact abuse happens when the abuser makes physical contact with the person. It includes:

- sexual touching of any part of the body whether the person is wearing clothes or not
- rape or penetration by putting an object or body part inside the person's mouth, vagina or anus, and any attempts to do so
- forcing the person to take part in sexual activity
- making the person take their clothes off or touch someone else's genitals

Non-contact abuse involves non-touching activities. It can happen online or in person and includes:

- forcing the person to watch or hear sexual acts
- making the person masturbate while others watch
- showing pornography to the person without their consent
- making, viewing or distributing sexual abuse images
- allowing someone else to make, view or distribute sexual abuse images
- meeting the person following online sexual grooming with the intent of abusing them
- sexual teasing, innuendo or sexual harassment

Online sexual abuse includes:

- forcing the person to send or post sexually explicit images of themselves; this is sometimes referred to as sexting
- forcing the person to take part in sexual activities via a webcam or smartphone

© Copyright Shaftesbury

- unwelcome sexual conversations by text or online

Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped. Abusers will often try to build an emotional connection with the person in order to gain their trust for the purposes of sexual abuse. This is known as grooming.

Spotting the signs of sexual abuse

There may be physical signs that someone has suffered sexual abuse. These include:

- anal or vaginal soreness or itching
- bruising or bleeding near the genital area
- discomfort when walking or sitting down
- an unusual discharge
- sexually transmitted infections (STI)
- pregnancy

Changes in the person's mood or behaviour may also cause concern. They may want to avoid spending time with specific people or show increased sexual behaviour**.** For example, they could use sexualised language or speak frequently about sex.

Neglect

What is neglect?

Neglect is not meeting a person's basic physical and/or psychological needs. This can result in serious damage to their health and/or development. Neglect may involve a parent, carer or other responsible person not:

- providing adequate food, clothing or shelter
- supervising the person or keeping them safe from harm or danger (including leaving them with unsuitable carers)
- making sure the person receives appropriate health and/or dental care
- making sure the person receives a suitable education
- meeting the person's basic emotional needs – this is known as emotional neglect

Neglect often happens at the same time as other types of abuse.

© Copyright Shaftesbury

Spotting the signs of neglect

Neglect can be difficult to identify. Isolated signs may not mean a person is suffering neglect, but multiple and persistent signs over time could indicate a serious problem.

Some of these signs include:

- people who appear hungry - they may not have lunch money or even try to steal food
- people who appear dirty or smelly
- people whose clothes are inadequate for the weather conditions
- people who require supervision but are left alone or unsupervised for long periods
- people who have untreated injuries, health or dental problems
- people with poor language, communication or social skills for their stage of development
- people who live in an unsuitable home environment.

Self Neglect

What is self-neglect?

Self-neglect is a lack of self-care to an extent that it threatens personal health and safety. It can include:

- neglecting to care for one's personal hygiene, health or surroundings
- inability to avoid self-harm
- failure to seek help or access services to meet health and social care needs
- inability or unwillingness to manage one's personal affairs.

Financial or material abuse

What is financial abuse?

Financial abuse is a type of abuse which involves having money or other property stolen or misused, or being defrauded or pressured in relation to money or property. This includes:

- theft of money or possessions
- fraud

© Copyright Shaftesbury

- scamming
- preventing a person from accessing their own money, benefits or assets
- staff taking a loan from a student
- undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- arranging less care than is needed to save money to maximise inheritance
- denying assistance to manage/monitor financial affairs
- denying assistance to access benefits
- misuse of personal allowance in a care home
- misuse of benefits or direct payments in a family home
- someone moving into a person's home and living rent free without agreement or under duress
- false representation
- using another person's bank account, cards or documents
- exploitation of a person's money or assets, e.g. unauthorised use of a car
- misuse of a power of attorney, deputy, appointeeship or other legal authority
- rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.

Domestic abuse

What is domestic abuse?

Domestic abuse is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality. It can include the following types:

- Emotional – e.g. belittlement, isolation from friends and family, controlling where the person goes or who they talk to.
- Threats and intimidation – e.g. threats to hurt/kill, harassing or following the person.
- Physical – e.g. hitting, shoving, throwing things at the person, choking.

© Copyright Shaftesbury

- Sexual – e.g. pressuring the person into having sex, touching them in a way that they do not want to be touched.
- Financial – e.g. controlling the person's use of money, not giving them enough money to survive.
- Coercion – e.g. controlling behaviours that include assault, threats, humiliation and intimidation to harm, punish or frighten someone to obtain compliance.

People can be directly involved in incidents of domestic abuse or they may be harmed by seeing or hearing abuse happening. People in homes where there is domestic abuse are also at risk of other types of abuse or neglect.

Spotting the signs of domestic abuse

It can be difficult to tell if domestic abuse is happening, because abusers can act very differently when other people are around.

Those who witness domestic abuse may:

- become aggressive
- display anti-social behaviour
- suffer from depression or anxiety
- not do as well in education – due to difficulties at home or the disruption of moving to and from refuges

Organisational or institutional abuse

What is organisational abuse?

Organisational abuse involves mistreatment, neglect or poor practice towards individuals by an organisation. It includes:

- discouraging visits or the involvement of relatives or friends
- run-down or overcrowded establishment
- authoritarian management or rigid regimes
- lack of leadership and supervision
- insufficient staff or high turnover resulting in poor quality care
- abusive and disrespectful attitudes towards people using the service
- inappropriate use of restraints

© Copyright Shaftesbury

- lack of respect for dignity and privacy
- failure to manage residents with abusive behaviour
- not providing adequate food and drink or assistance with eating
- not offering choice or promoting independence
- misuse of medication
- failure to provide care with dentures, spectacles or hearing aids
- not taking account of individuals' cultural, religious or ethnic needs
- failure to respond to abuse appropriately
- interference with personal correspondence or communication
- failure to respond to complaints.

Discriminatory abuse

What is discriminatory abuse?

Discriminatory abuse is unequal treatment based on one or more 'protected characteristics'.

The Equality Act 2010 lists the following protected characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion and belief
- sex or sexual orientation.

Discriminatory abuse can include:

- verbal abuse
- derogatory remarks or inappropriate use of language related to a protected characteristic

© Copyright Shaftesbury

- denying access to communication aids
- not allowing access to an interpreter, signer or lip-reader
- harassment or deliberate exclusion on the grounds of a protected characteristic
- denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- substandard service provision relating to a protected characteristic.

Disability hate crime

Disability hate crime is a crime or incident motivated by hatred or prejudice towards a person because of their actual or perceived disability. This is a type of discriminatory abuse.

Bullying and cyberbullying

What are bullying and cyberbullying?

Bullying is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable.

Bullying includes:

- verbal abuse, such as name calling
- non-verbal abuse, such as hand signs or glaring
- emotional abuse, such as threatening, intimidating or humiliating someone
- exclusion, such as ignoring or isolating someone
- undermining, by constant criticism or spreading rumours
- controlling or manipulating someone
- racial, sexual or homophobic bullying
- physical assaults, such as hitting and pushing
- making silent, hoax or abusive calls.

Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games and mobile devices. Online bullying can also be known as cyberbullying.

Cyberbullying includes:

- sending threatening or abusive text messages

© Copyright Shaftesbury

- creating and sharing embarrassing images or videos
- 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
- excluding people from online games, activities or friendship groups
- setting up hate sites or groups about a particular person
- encouraging people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a person or cause trouble using their name

Spotting the signs of bullying and cyberbullying
It can be hard to know whether or not someone is being bullied. They might not tell anyone because they are scared the bullying will get worse. They might also think the bullying is their fault. No one sign indicates for certain that someone is being bullied, but you should look out for:

- belongings getting ‘lost’ or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school or college, being mysteriously 'ill' each morning, or skipping school or college
- not doing as well at school or college
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others

Modern slavery

What is modern slavery?

Modern slavery includes human trafficking, forced labour, domestic servitude, sexual exploitation (such as escort work, prostitution and pornography) and debt bondage i.e. being forced to work to pay off debts.

© Copyright Shaftesbury

Criminal and Sexual Exploitation

Criminal exploitation and **sexual exploitation** are forms of abuse that may be difficult to identify because perpetrators often use coercion, manipulation, grooming, intimidation, debt, gifts, drugs, alcohol, affection or threats to control the individual.

Criminal exploitation occurs when an individual is coerced, controlled, manipulated or deceived into criminal activity for another person's benefit. It may be linked to modern slavery, trafficking, county lines activity, theft, fraud, forced begging, drug production or distribution.

Adult sexual exploitation is a form of sexual abuse in which a person is coerced, manipulated or deceived into sexual activity in exchange for something they need or want, or for the benefit of the perpetrator. The apparent consent of the adult does not necessarily mean exploitation is not occurring.

Female genital mutilation

What is female genital mutilation?

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. FGM is abuse. There are no medical reasons to carry out FGM. It is dangerous and a criminal offence.

Spotting the signs of female genital mutilation

Someone at risk of FGM may not know what is going to happen. But they might talk about or you may become aware of:

- a long holiday abroad or going 'home' to visit family
- relative or cutter visiting from abroad
- a special occasion or ceremony to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin or an older female relative such as a mother or aunt
- missing school/college repeatedly or running away from home

Someone who has had FGM may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school or college

© Copyright Shaftesbury

- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

Forced Marriage

What is forced marriage?

A marriage without the consent of one or both parties and where duress is a factor. In a forced marriage one or both spouses either do not, or cannot, consent to the marriage.

Cuckooing

What is cuckooing?

Also referred to as 'home invasion' or 'home takeover'. It involves criminals taking control of another person's home in order to use it for criminal activity. This criminal activity could involve offences relating to drugs, sexual abuse, and weapons. Criminals might also use the property to store money or stolen goods, or simply as a place to sleep.

Online Abuse

Online abuse (sometimes called digital abuse or technology-facilitated abuse) can have a significant impact on adults at risk, particularly those with learning disabilities, cognitive impairments, mental health needs, sensory impairments, social isolation, or limited digital literacy.

Online abuse is any form of abuse that is facilitated through digital technology, including social media, messaging platforms, email, gaming platforms, websites, mobile devices, and other online services. It may include cyberbullying, harassment, stalking, grooming, financial exploitation, fraud, identity theft, sexual exploitation, coercive and controlling behaviour, and the sharing of inappropriate or harmful content. Adults at risk may be particularly vulnerable to online abuse due to social isolation, communication difficulties, cognitive impairment, mental ill-health, or limited digital awareness. Any concerns regarding online abuse should be treated as safeguarding concerns and responded to in accordance with this policy.

AI-enabled abuse and exploitation is an emerging risk. Adults at risk may be particularly vulnerable because AI can make scams, grooming, impersonation and manipulation more convincing and more difficult to detect.

© Copyright Shaftesbury

The Prevent Duty

Background

Shaftesbury has a duty under the Counter Terrorism and Security Act 2015 (CTSA 2015) to have due regard to the need to help prevent people from being drawn into terrorism. This duty, known as the Prevent Duty, is about safeguarding people and communities from the threat of terrorism. The duty applies to safeguarding those who may be vulnerable to being drawn into terrorism or extremist ideologies. It covers all types of extremism, whether political, religious, racial or ideological.

The Act states that authorities subject to the provisions must also have regard to the statutory guidance issued under section 29 of the Act when carrying out the duty. The guidance summarises requirements in terms of four themes: risk assessment, working in partnership, staff training and IT policies. Shaftesbury recognises that Prevent is part of its wider safeguarding duty.

The Prevent duty is consistent with existing duties, such as the requirement to abide by the Equality Act 2010, promote 'fundamental British values', secure a balanced presentation of political issues and promote community cohesion.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

Radicalisation can occur both online and offline. Staff should be aware that social media platforms, online communities, encrypted messaging services, gaming environments and emerging technologies may be used to disseminate extremist content or facilitate radicalisation.

Although these indicators do not necessarily mean a person is being or has been radicalised, the potential signs of radicalisation include:

- Ignoring or demonising viewpoints that contradict their own.
- Expressing themselves in an 'us vs. them' manner about others who have alternative beliefs,
- Increasingly secretive or unwilling to discuss views.
- Using derogatory language.
- Changing their circle of friends.

© Copyright Shaftesbury

- Losing interest in activities they once enjoyed.
- Becoming socially withdrawn or spending a lot of time online.
- Belief in conspiracy theories and distrust of mainstream media.
- Justifying the use of violence or expressing a desire for revenge.
- Being secretive about who they talk to online and which websites they visit.
- Fixation on extremist material.
- Sudden intolerance towards protected groups.
- Increased engagement with extremist online content.
- Sharing extremist symbols, propaganda or messaging.
- Expressions of admiration for terrorist acts or perpetrators.
- Susceptibility to conspiracy narratives linked to extremist ideology

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to be being drawn into terrorism. Every LA has a Channel programme which provides a source of advice - anyone can make a referral.

Protecting the people who use our services from the risk of radicalisation

Shaftesbury is compliant with the most recent Prevent Duty guidance: Prevent duty guidance - GOV.UK

The duty to protect people who use our services from the risk of radicalisation is seen as a part of the wider safeguarding duties of Shaftesbury's education centers, similar to the responsibility to protect students from harm caused by, for example, drugs, gangs, neglect or sexual exploitation.

Shaftesbury recognises the potential vulnerability of many of those we work with in our other services. For this reason, as well as specific training for staff within our education services, all Shaftesbury staff receive appropriate training on radicalisation. Prevent awareness training is provided for members of staff, volunteers and Local Advisory Board (LAB) members.

© Copyright Shaftesbury

As with managing other safeguarding risks, staff should be alert to changes in behavior which could indicate that those we work with may be in need of help or protection. Staff, in liaison with the DSL, should use their professional judgement in identifying anyone who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Our school and colleges promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. They have clear protocols for ensuring that any visitors and visiting speakers are suitable and appropriately supervised at our settings. DSLs and Prevent leads undertake awareness training to support them in identifying those at risk of being drawn into terrorism and to challenge extremist ideas. Procedures are kept under review in order that amendments can be made as required as a result of changes in the regulations and/or external guidance.

All students at a Shaftesbury Education setting have a completed Prevent Risk Assessment in place.

Shaftesbury Education's Prevent Leads triage Prevent cases and take appropriate action as required.

Refer to the Shaftesbury Education Prevent Duty Policy for more detail on risk assessments, training, use of external speakers and other measures relating to Prevent.

Any concerns that an adult may be vulnerable to radicalisation or extremism should be reported to the DSL following the school's procedures.

Online Safety

Our approach to online safety is based on addressing the four categories of risk:

Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact – being subjected to harmful online interaction with other users, or generative applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual

© Copyright Shaftesbury

sharing of nudes and semi-nudes), sharing other explicit images, including those generated by AI and online bullying.

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To manage risk and safeguard students from potentially harmful and inappropriate online material we:

- Ensure that filtering and monitoring systems are in place on all devices and networks.
- Ensure the DSL and safeguarding teams understand their responsibilities around online safety, know what filtering systems are in place and are notified of all monitoring alerts.
- Ensure filtering systems are robust and appropriate without unreasonably impacting teaching and learning.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff receive regular training updates.
- Ensure staff are aware of the expectations and restrictions around the use of mobile phones and smart technology and social media usage.
- Teach students about online safety as part of the curriculum, for example safe use of the internet, social media and technology, how to recognise unacceptable behaviour online, how to recognise and report incidents of cyber-bullying.
- Inform parents and carers about online safety and how to report any concerns.

All students should have an online safety risk assessment conducted as part of their annual "keeping me safe" review. This document provides a summary score and should be used to establish risk.

A safeguarding referral should be made in accordance with the Directorate Online Safety Policy.

For further information about online safety, please refer to our Online Safety Policy.

Mobile Phone Use

Shaftesbury Education recognises that national guidance on mobile phone use in schools is intended to reduce safeguarding risks, minimise distraction, and promote a safe learning environment. While the statutory school guidance applies directly to school-age pupils, Shaftesbury Education also supports adult students across its colleges and must balance online safety expectations with adults' rights to autonomy, communication, consent, privacy, and reasonable adjustments. For adult students, mobile phone use will therefore be managed

© Copyright Shaftesbury

through individual risk assessment, the Online Safety Policy, local safeguarding protocols, and, where relevant, the Mental Capacity Act. Any restrictions on mobile phone use will be lawful, necessary, proportionate, clearly explained, and based on identified safeguarding, educational, health, or wellbeing risks. Where a student requires a mobile phone for communication, accessibility, medical support, independence, travel training, or contact with family, this will be reflected in their individual plan. Concerns about unsafe, exploitative, or inappropriate use of mobile technology will be treated as safeguarding concerns and responded to in line with this policy.

Attendance and Safeguarding

Shaftesbury Education is committed to ensuring the safety and wellbeing of all students, including those who may be missing from education. We recognise that prolonged or repeated absence from school or college can indicate safeguarding concerns. Regular monitoring of attendance records can help identify patterns of absence.

Refer to the Student Attendance Policy and Procedure.

Contextual Safeguarding

The British Association of Social Workers (BASW) defines contextual safeguarding as “an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore, children’s social care practitioners need to engage with individuals and sectors who do have influence over/within extra- familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.”[1]

Contextual safeguarding is also an important part of safeguarding adults, and Shaftesbury Education works with local authorities and other agencies in the community as required.

[1] Contextual Safeguarding | BASW

© Copyright Shaftesbury

What to do when you have a Concern or a Student discloses Abuse or Neglect

Action to be taken by everyone

The following action should be taken by anyone who has concerns about the welfare of a student. Staff should not assume a concern will be reported by a colleague or another professional.

NON-ACTION IS NOT AN OPTION.

Actions:

Step 1: Make sure everyone is safe now. If they aren't, take immediate action to make them safe; this may include calling the police (see Step 3).

Step 2: If a disclosure is being made, you should:

- React calmly so as not to frighten or alarm the student. Listen to what they have to say and allow the pace of the conversation to be dictated by the student.
- Tell them they were right to tell and acknowledge how hard it was for them to tell you.
- Tell them that they are not to blame.
- Take what they say seriously.
- Reassure them that the information will be treated with respect but that you are required as part your job to report it (to the DSL) to ensure that the student can be helped to stay safe and feel better.
- Ask only questions which will clarify the nature of the allegation. Questions should be neutral, such as "can you tell me what happened?". Avoid interviewing them or asking explicit details of the allegation as this may hinder a police enquiry.
- Note carefully any clearly visible external signs of possible injury or neglect.
- Preserve any forensic evidence i.e. the scene of the incident, place of entry/exit to the room/building, clothing, person's body etc.

If a disclosure is being made, you should **not**:

- Burden the student with guilt by asking questions such as "why didn't you tell me before?"
- Interrogate or pressure the student to provide information.

© Copyright Shaftesbury

- Ask any potentially leading questions such as those that start with the words: how, when, where and why.
- Undress the student or examine clothed parts of the student's body in an attempt to determine the nature of any such injuries/neglect.
- Criticise the perpetrator; this may be someone the student loves.
- Promise confidentiality.
- Make promises that you cannot keep such as "I'll stay with you all the time" or "it will be alright now".

Step 3: Report the concern to the DSL or another member of the Safeguarding Team, using the reporting method specified in your setting's Local Safeguarding Protocol – unless this person is part of the allegation. If this person dismisses the concern you should contact their next line manager (See Shaftesbury Whistle-blowing policy).

All settings display a safeguarding poster identifying the DSL and other members of the Safeguarding Team. All members of staff have a duty of care to ensure that they speak to a DSL or member of the Safeguarding Team about their concerns.

If the student wants to call the police immediately and they need support to do so, this should be provided by the DSL or Head of Setting. In line with local protocol, the Head of Setting and DSL must be informed prior to a call taking place.

Step 4: Write up a factual account of what you've been told and what you've done, using the reporting method specified in your setting's Local Safeguarding Protocol.

- Record the date, time, place and context of the disclosure or concern, and what has actually been said, not assumption or interpretation. Accounts must be signed and dated.
- Clearly distinguish between fact, observation, allegation and opinion.
- Record observed injuries and bruises on a body map.
- Note the non-verbal behaviour and the key words in the language used by the student (do not translate into "proper terms").
- Appreciate that your records may be used in criminal proceedings or disciplinary investigations.

Any concerns about students must be discussed with or referred to the DSL as soon as possible and at the latest by the end of the session the concern occurred in.

Local protocols may have different reporting arrangements. Shaftesbury Education requires all staff to read and sigh the Local Safeguarding Protocol for the setting they are employed in alongside this document.

© Copyright Shaftesbury

Do not underestimate the effects and impact on you. Make sure you speak to a manager or the People Team about how you are feeling. They will make sure you know where to go to get support and that you know who you can talk to if needed.

Remember:

- It is not the job of the person who raises the concern to decide if abuse has taken place. Do not put off taking action.
- Do not leave it to someone else to help the person at risk and do not assume that someone else will report the concern.
- Do not be afraid to voice your concern – the person at risk may need urgent safeguarding.
- Do not promise not to tell. This could make you an accessory to abuse.
- Do not begin your own investigation.

Action to be taken by the Designated Safeguarding Lead (DSL)

Usually initial actions must start as soon as a safeguarding concern has been raised.

Actions:

Step 1: Make sure everyone is safe now. If they aren't, take immediate action to make them safe; this may include calling the police (see Steps 3 and 4).

Step 2: Check all required actions have been completed by the person raising the concern and collate all relevant information. Ensure any forensic evidence is secured.

Step 3: Inform the Head of Setting and Director for Education for all issues greater than minor, including if 'out of hours'. Where the disclosure relates to actual abuse or the suspicion of abuse, the DSL will report the disclosure to the Head of Setting, Director for Education and Adult Social Care within 24 hours. The DSL may discuss the concern with the Head of Setting and/or Director for Education, or take advice from Adult Social Care, before deciding whether to make a referral.

For minor issues ensure all appropriate actions are taken in line with Safeguarding Reporting Procedure and Local Protocol.

If the student wants to call the police immediately you must support their decision to do so. However, it is better if we contact the police once we have talked the issue through with the relevant LA Safeguarding Team / Adult Social Care (see Local Protocol).

© Copyright Shaftesbury

Step 4: If a police contact is required contact the relevant LA Safeguarding Team (see Local Protocol) and agree on an immediate plan, including communicating with police if appropriate, and who will contact family members, the potential source of risk and other people who use our services and staff.

REMEMBER – Everyone is entitled to the protection of the law and access to justice. Behaviour which amounts to abuse and neglect, for example physical or sexual assault, psychological abuse or hate crime, willful neglect, unlawful imprisonment, theft and fraud and certain forms of discrimination also often constitute specific criminal offences under various pieces of legislation. Although the LA has the lead role in making enquiries, where criminal activity is suspected, the early involvement of the police is likely to have benefits in many cases.

Step 5: Follow any agreements for immediate action made with the LA Safeguarding Team.

Step 6: Ensure actions taken are recorded within CPOMS in line with Safeguarding Reporting Procedure.

Step 7: All matters reported to the LA must be reported to the Director for Education and any guidance given should be followed.

Step 8: All CQC registered services MUST:

- Inform the regulatory body within 24 hours on the standard notification forms.
- Inform social worker/care manager of commissioning or sponsoring authority.

DO NOT:

- put off taking action.
- leave it to someone else to help the student at risk.
- be afraid to voice your concern as the student at risk may need urgent safeguarding.
- promise not to tell. This could make you an accessory to abuse.
- begin your own investigation.

© Copyright Shaftesbury

Action to be taken by the Registered Manager

(This may be the same person as the DSL above[2])

Actions:

Step 1: Make sure everyone is safe now. If they aren't, take immediate action to make them safe.

Step 2: Confirm immediate facts – establish what happened and ensure all immediate actions required have been completed by the person raising the concern and/or the DSL as required.

Step 3: In conjunction with the DSL (where the Registered Manager is not the DSL) commence the fact finding process**.**

Step 4: Assess need to suspend potential source of risk (if staff member)

Step 5: In conjunction with the DSL, produce and implement action plan – ensure local protocols for use of Cause for Concern and CPOMS are used.

Step 6: Ensure the person reporting the concern and where relevant, the student at risk and their parents/carers are informed of action taken and kept up to date throughout the process.

DO NOT:

- put off taking action.
- leave it to someone else to help the student at risk.
- be afraid to voice your concern – the student at risk may need urgent protection.
- promise not to tell. This could make you an accessory to abuse. Where the fact finding process identifies opportunities for learning and improving service quality the registered manager is also responsible for proposing changes to operational policies and procedures, service design or staffing arrangements identified as a result of investigations.

Action to be taken by the Head of Setting

Actions:

- Monitor the effectiveness of DSL's responses, fact finding reports, action plans and investigations into safeguarding concerns across their setting.
- Review responses, fact finding reports, action plans and investigations to all safeguarding concerns across their setting.

[2] Shaftesbury Education settings with CQC registration may appoint a Registered Manager who is also the DSL.

© Copyright Shaftesbury

- Propose changes to local operational protocols and procedures, structure design or staffing arrangements identified as a result of investigations.
- Recommend closure of cases to the Education Safeguarding Forum, chaired by the Directorate Safeguarding Lead.

Escalation procedures

When staff report concerns about a student it is reasonable to expect the DSL to respond within a specified time frame to say what action has been taken. If staff have not heard back from the DSL they can ask again after the specified time period for feedback has elapsed. In the event that a member of staff does not agree with the action taken, they can escalate the concern to the Head of Setting.

If the DSL is not satisfied with, or disagrees with, the decision made by Adult Social Care, they can challenge this through further discussion with the social work team or raise it formally through the professional disagreement procedure which can be found on the Local Safeguarding Partnership website. The DSL can also escalate the case to the Director for Education.

Consent

The Making Safeguarding Personal Guide 2014 states that “Professionals should work with the adult to establish what being safe means to them and how that can be best achieved. Making safeguarding personal means it should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety”.

Shaftesbury Education implements this through co-production, personalised learning outcomes and its PSHE curriculum.

Wherever possible, we will seek consent to a safeguarding referral being made or action taken on behalf of an adult, unless there are overriding reasons not to do so. Possible exceptions to this general rule are:

- If it would place the adult or others at greater risk of harm
- If other people appear to be at risk of harm (adults or children)
- If there is a ‘legal restriction’ or an overriding public interest

© Copyright Shaftesbury

- If the person is exposed to life threatening risk and they are assessed as withholding their consent without capacity to understand the associated risk.
- If the person lacks mental capacity to make the specific decision relating to safeguarding concerns or information sharing.
- If the person does not consent, and there are concerns about the person's welfare or safety, you should talk to a DSL for advice as soon as possible. The Local Authority can also be approached for advice if in doubt as to whether to refer.

We must always consider whether the adult has the mental capacity to understand and make decisions about the abuse or neglect related risks, any immediate safety actions necessary, and whether they consent to those actions being taken and information being shared. Consideration should be given to whether the adult's decision is being influenced by coercion, duress, intimidation, exploitation or undue influence.

Information may be shared without consent where there is a lawful basis to do so and where this is necessary and proportionate to protect the adult or others from abuse or neglect.

Decisions about consent and making referrals should be documented with the rationale as to why decisions have been made. This documentation should also include a chronology of when discussions took place with the adult and other agencies. The views of the adult should be documented.

Mental Capacity Act (MCA)

REMEMBER - *follow good practice under the Mental Capacity Act when speaking to the person. Assume the adult has capacity unless proven otherwise. If the person is proven to lack capacity, speak to their representative(s) and always act in their best interests.*

Where a person lacks capacity, relevant decisions and/or actions must be taken in their best interests and with the appropriate involvement of relevant parties, such as the social worker or care manager, family members, GP or hospital doctor.

DSLs and Heads of Settings should consider whether the person needs the support of an Independent Mental Capacity Advocate (IMCA) or Best Interest Assessor.

Medication Administration Incidents

The administration of medication places great responsibility on us as a provider of high-quality services, and shortfalls can lead to serious risk of harm. Therefore, Shaftesbury Education requires that all medication administration incidents and errors are reported immediately to the

© Copyright Shaftesbury

DSL, recorded on CPOMS in line with safeguarding procedures and local protocols, and notified to the Director for Education for all incidents above minor.

As with all safeguarding, there is the dual aim of ensuring further harm is mitigated and that learning improves our practice. To enable us to do this, we need to undertake 'fact finding' and lessons learnt procedures that align with the medication administration process.

Completion of reporting will require the use of the Incident Decision Tree to determine the likely root cause and the appropriate outcomes. These outcomes will be recorded on the reporting form, on CPOMS, and through monthly KPI with monitoring to completion.

Refer to the Medication Administration Policy and Procedure for more detail.

Supporting a Person who makes Repeated Allegations

A person who makes repeated allegations that have been looked into and are unfounded should be treated without prejudice:

- Each allegation must be risk assessed and reviewed to establish if there is new information that requires action under these procedures.
- A risk assessment must be undertaken and recorded and measures taken to protect staff and others, where appropriate.
- Each incident must be recorded as an alert and entered onto the safeguarding database by the DSL.
- The DSL should ensure that the individual circumstances are discussed with the person's social worker and the plan of action agreed, recorded as part of the individual care plan and shared with all relevant parties.
- It is recognised that someone who makes repeated allegations may be in need of safeguarding.

When the Person Causing Harm has Care and Support Needs

In cases where the potential source of risk is another person (adult or child) with care and support needs, the agency responsible for their care must be informed. This would be done by the DSL contacting their social worker or case manager. The individual may need an

© Copyright Shaftesbury

assessment – e.g. health or care, behaviour, mental health, MCA or Deprivation of Liberty Safeguards (DoLS) – in their own right to establish whether they require additional specialist services. They may also be entitled to the support of an IMCA if they lack mental capacity.

Adults with Mental Health Needs

Shaftesbury recognises that adults experiencing mental ill health may be at increased risk of abuse, neglect, self-neglect, exploitation, discrimination and social isolation. Safeguarding responses must be person-centred and should not assume that a mental health condition affects an individual's ability to make decisions. Consideration must be given to the individual's mental capacity in relation to specific safeguarding decisions in accordance with the Mental Capacity Act 2005. Where concerns arise regarding abuse, neglect, self-neglect, coercion, exploitation or significant risks to wellbeing, staff must follow safeguarding procedures and seek advice from a Designated Safeguarding Lead.

Allegations against Staff

All Shaftesbury Education staff and volunteers are expected to follow the Code of Conduct which outlines expected standards of behaviour and conduct. Staff should also adhere to the guidelines on personal and professional conduct set out in Part 2 of the Teachers' standards – Gov.UK as well as the school/college's policies.

Any student making an allegation against a member of staff will be treated sensitively and made to feel safe and listened to. If there are any immediate safety concerns, action must be taken to remove the student from harm.

Managing allegations against staff

It is acknowledged that a parent, student, or another staff member may raise an allegation against a member of staff, including volunteers and supply staff. If an allegation is made:

- The staff member receiving the allegation must promptly inform the Head of Setting or the most senior DSL within the Senior Leadership Team if the Head is unavailable. If the allegation involves the DSL or Head of Setting, the Director for Education must be contacted for guidance.
- The Head of Setting or DSL will discuss the allegation with the Local Authority Designated Officer (LADO) for Adult Safeguarding.
- In situations occurring outside regular office hours, contact details provided within each setting should be used.

© Copyright Shaftesbury

Settings are required to follow local authority procedures outlined in the LADO protocol for managing allegations against staff, along with statutory guidance from KCSIE.

Possible lines of investigation into an allegation include LA safeguarding services making enquiries and assessing whether an adult needs support, and disciplinary procedures being activated.

If an allegation is made that a staff member or volunteer has:

- behaved in a way that has harmed, or may have harmed a student
- possibly committed a criminal offence against, or related to, a student
- behaved towards a student or students in a way that indicates they may pose a risk of harm to students
- behaved in a way that indicates they may not be suitable to work with students

then this should be reported immediately to the police or Adult Social Care.

If police involvement is necessary, whenever possible, the Head of Setting or DSL should liaise with the police before communicating with the member of staff who is the subject of the allegation.

Actions taken must align with Shaftesbury's disciplinary procedures and employment law. The employee has the right to be informed, in broad terms, that concerns or allegations have been raised about them. Individuals subject to allegations should be informed promptly. However, maintaining confidentiality is essential, in compliance with reporting restrictions set by the Education Act 2011.

It is important that accurate records are kept of allegations, actions taken, advice received and the response.

Consideration should also be given to how students are supported through the process, as well as the member of staff involved.

Suspension of the staff member under scrutiny requires careful deliberation, and consultation with the LADO for Adult Safeguarding and the Shaftesbury People Team.

If the staff member resigns from their post or refuses to cooperate with the process, this would not prevent an allegation being followed up.

'Settlement agreements' (where a person agrees to resign and the employer agrees not to pursue disciplinary action) are **not** used in cases of alleged abuse.

© Copyright Shaftesbury

Duty to refer

Shaftesbury Education has a legal duty to refer anyone who has harmed or might have been at risk of harming a student to the DBS, regardless of whether the person was dismissed, moved roles, or left of their own accord.

Investigation outcomes

KCSIE defines possible outcomes of allegations as:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person who is the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Where a safeguarding investigation outcome/disciplinary process determines that a teacher is unsuitable to work with students their name will be reported to the Teaching Regulation Agency, with advice and support from the People Team and Director for Education and LADO where appropriate. This will be conducted in accordance with Barring Regulations and Shaftesbury's disciplinary procedures.

Reportable conduct includes:

- Unacceptable professional conduct, including serious breaches of the Teachers' Standards (e.g. dishonesty, misuse of social media, inappropriate relationships)
- Conduct that may bring the profession into disrepute
- Conviction of a relevant criminal offence, especially involving violence, dishonesty, sexual misconduct, or safeguarding
- Serious safeguarding failures, including:
    - Abuse of trust
    - Failure to follow safeguarding procedures
    - Failure to protect students from risk of harm

© Copyright Shaftesbury

If an allegation against a member of staff is substantiated, action will be taken in line with the Managing Allegations against Staff Policy – action may include:

- considering any factors that may have contributed to or failed to prevent abuse occurring
- reviewing safeguarding measures to ensure ongoing vigilance
- making changes to organisational policies and procedures as necessary.

Staff Conduct

Safer working practice

All staff are expected to follow the Shaftesbury Staff Code of Conduct and follow guidance and local protocols around professional boundaries and physical contact.

Staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for staff working with individual students to do so in view of other staff. If staff anticipate being in a situation that could be open to misinterpretation they should alert a senior leader in advance and inform the student's parent or carer.

Staff should escort students of the same sex to the toilet but are not expected to be involved with personal care, unless the student has an additional need and a care plan has been agreed in writing.

We recognise that physical touch between staff and students in relation to the activity being provided is acceptable in public places; however, this will be carefully risk assessed and agreed with the Senior Leadership Team.

Low level concerns

At Shaftesbury Education, we promote an open and transparent safeguarding culture. Staff are encouraged to report any concerns - even if no more than a 'nagging doubt' – about the behaviour, conduct or attitudes of a staff member, volunteer or contractor working in or on behalf of the setting.

KCSIE refers to 'low-level concerns' as any concerns or allegations which do not meet the threshold set out at paragraph 432 of KCSIE. This does not mean the concern is insignificant. The person may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and

© Copyright Shaftesbury

- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over-friendly with students
- having favourites
- taking photographs of students on their mobile phone, contrary to policy
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared with the DSL, recorded and dealt with promptly and appropriately.

Confidential records should be kept of all low-level concerns, including the nature of the concern and action taken. A review can indicate if there are emerging patterns.

Whistleblowing

We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in relation to students. Please refer to the Whistleblowing and Raising Concerns Policy.

Staff Training

All staff will receive face to face training on safeguarding as part of their induction.

All staff will receive face to face refresher safeguarding training at least annually with a particular focus on recognising signs of abuse, managing a disclosure as well as recapping monitoring and reporting procedures of abuse and suspected abuse. In addition, staff will receive regular training updates about safeguarding related issues.

Online safeguarding training will also be used as refresher training.

Every member of staff is required to sign to confirm that they have read and understood: the Safeguarding Adults Policy, Safeguarding Children Policy, Safeguarding Reporting Procedure, Local Safeguarding Protocol, Staff Code of Conduct and KCSIE Part One.

© Copyright Shaftesbury

The safeguarding training of third-party staff/contractors is verified and, if necessary, further training may be given as part of the induction process. Third-party colleagues also sign the Staff Code of Conduct.

Training records are regularly reviewed. Local Safeguarding Protocols detail the measures in place to manage staff who have missed training.

Staff competency in responding to safeguarding concerns are monitored on an ongoing basis and additional training provided as required. Should a student or a member of staff be concerned about another member of staff's conduct in relation to safeguarding then procedures are put in place.

Specific training is provided for DSLs. DSLs keep up to date on safeguarding through local and national networks and cascade relevant information to all staff.

Safer Recruitment

Shaftesbury Education recognises that sometimes people who want to cause harm to adults actively seek employment that provides them access to adults at risk. Settings will protect our students by thorough and rigorous scrutiny of all applications. We will implement the charity's Safer Recruitment Policy which requires our Education settings to:

- Verify the applicant's identity
- Check qualifications, experience and employment history
- Obtain professional and character references **prior to interview wherever possible and scrutinise any discrepancies, anomalies, gaps in employment history or concerns identifed during the recruitment process**
- Check applicant's health and physical capacity to undertake the job **in accordance with equality legislation and where appropriate to fitness to undertake the role**
-
- Hold a face-to-face interview for all candidates with at least one member of the panel who has attended safer recruitment training.
- Ensure all adults in regulated activity with students have been DBS checked and barred list checked.
- **Where an applicant has lived or worked overseas criminal record checks will be obtained where available, Translations of original documents must be verified.**
- **Carry out an online search of shortlisted candidates as part of due diligence**

© Copyright Shaftesbury

- Make staff aware of their contractual, legal, administrative and pastoral responsibilities. A key document to support staff's understanding in this area is KCSIE which is made available to all staff.

All pre employment checks will be recorded on the college's SCR.

Following appointment, all staff will receive safeguarding training and support as part of their induction. Training will be updated annually and is regularly reviewed to ensure expectations are being met.

In recruiting and appointing staff, the Head of Setting and People Team have key responsibilities 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 students.

Refer to the Recruitment and Selection Policy for more information.

Recording Information

It is very important that all concerns are properly recorded whether the local authority are involved or not. Records of concerns may reveal patterns, which may indicate abuse or identify unmet needs. Poor record keeping is regularly identified as one of the main safeguarding challenges, which can put Shaftesbury and its students at risk.

Staff should follow these guidelines when recording safeguarding information:

- Records should be only as long as necessary and written in everyday plain English without abbreviations.
- Certain information may not be available to you. Do not pursue the questioning of the person for this information if it is not given freely. Consult any files or documentation Shaftesbury may have for these details. Do not delay reporting the matter by waiting for all the information.
- It is important to stick to the facts. However, your opinion may be crucial but ensure that it is recorded as an opinion and that you can state evidence to support your thinking. Records pertaining to issues of safeguarding may be accessible to third parties, such as local authorities, police, the courts and solicitors.
- All safeguarding incidents, concerns and allegations should be recorded using local setting protocols. This includes the use of CPOMS. The details of any action and outcome of a safeguarding enquiry is confidential to the individual concerned and professionals who need to know. However, it is appropriate to expect a level of

© Copyright Shaftesbury

feedback. This may be from the DSL or local authority, which tells you that action has been taken, and that the person is okay and safe.

- Copies of all records relating to safeguarding issues must be kept securely. All documents should be uploaded to the documents section in CPOMS.

Sharing Information

Notifying parents/carers

The setting will normally seek to discuss any concerns about a student with their parents or carers. However, staff should not discuss concerns with parents or carers directly and should always consult with the DSL and follow advice from the DSL. Concerns must be handled sensitively and the DSL will make contact with the parent or carer in the event of a concern, suspicion or disclosure. However, if the setting believes that notifying parents or carers could increase the risk to the student or exacerbate the problem, then advice will first be sought from Adult Social Care. Consideration will be given as to how to maintain a good working relationship with parents and carers when there are safeguarding concerns.

Referrals

The decision to make a referral which could activate a safeguarding investigation, is a serious matter and requires careful judgement. These decisions must only be taken by the Head of Setting or by the DSL, who will liaise with the Head of Setting as appropriate, following consultation as appropriate with Adult Social Care.

Where the disclosure relates to actual abuse or the suspicion of abuse, the DSL will report the disclosure to Adult Social Care within 24 hours.

In the event of the setting making a referral to Adult Social Care, they should agree with the recipient of the referral what exactly the student and their parents and/or carers will be told, by whom and when. The DSL should ask to be kept informed of the timing of the strategy discussion between Adult Social Care and the police, which will decide whether and how to investigate. The DSL should be prepared to contribute to the strategy discussion.

Adult Social Care are required to acknowledge written referrals within one working day. If the setting has not heard from Adult Social Care after two working days, it will make contact again. A record of each contact with Adult Social Care, including the name(s) of the officer spoken to, should be kept.

Decisions and the rationale relating to sharing information with or without consent should be recorded.

© Copyright Shaftesbury

Confidentiality and sharing information

REMEMBER – *Sharing information about safeguarding should not be delayed because of concerns about confidentiality – safeguarding always overrides confidentiality.*

Nonetheless, all staff should understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the student(s) and staff involved, but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, Deputy DSL, Head of Setting, Director of Education or Safeguarding Trustee (depending on who is the subject of the concern). That person will then decide who else needs to have the information and will disseminate it on a 'need-to-know' basis.

Safeguarding information will be stored and handled in line with General Data Protection Regulation (GDPR), 2018 principles. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights secure.

Records of referral forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store safeguarding information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Safeguarding information will be stored separately from the student's school/college file and the school/college file will be 'tagged' to indicate that separate information is held.

Safeguarding records are normally exempt from the disclosure provisions of GDPR, which means that students and their parents or carers do not have an automatic right to see them. If any member of staff receives a request from a student or parent/carer to see safeguarding records, they should refer the request to the Head of Setting.

GDPR principles do not prevent settings from sharing information with relevant agencies, where that information may help to protect a student. When information is shared, the reason for doing so as well as the reasons why consent may not have been sought, will be clearly documented within the safeguarding records.

© Copyright Shaftesbury

When a student leaves the setting, their safeguarding files will be copied, with the copies archived and stored securely for 7 years and the original securely packaged and transferred by hand to the new setting. A signed document acknowledging receipt of the record will be requested from the new setting.

Guidance from the Information Commissioner's Office (ICO) can be found here: Data sharing | ICO

Duty of Candour

On 1 April 2015, the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 extended a new duty of candour, to all service providers of regulated activities.

The duty of candour requires Shaftesbury to act in an open and transparent way in relation to care and treatment provided to our students. This duty applies to our dealings with students, and the people who act on the behalf of students who lack capacity.

The duty means that, as soon as reasonably practicable, after becoming aware that a safeguarding incident has occurred which meets the 'notifiable safety incident' criteria, either the 'registered person' or the Head of Setting must notify the 'relevant person' that the incident has occurred, and provide reasonable support to them in relation to the incident.

'Notifiable safety incident' is a specific term defined in the duty of candour regulation as an incident that meets all three of the following criteria:

- It must have been unintended or unexpected.
- It must have occurred during the provision of an activity we regulate.
- In the reasonable opinion of a healthcare professional, it already has, or might, result in death, or severe or moderate harm to the person receiving care. This element varies slightly depending on the type of provider.

If any of these three criteria are not met, it is not a notifiable safety incident (although the overarching duty of candour, to be open and transparent, always applies).

The 'registered person' is the person responsible for carrying out, or delegating the responsibility for carrying out, the duty and must liaise with the 'relevant person'.

The 'relevant person' is the student or the person acting on the behalf of students who lack capacity regarding decisions relating to their overall care or treatment and how/where it is managed.

© Copyright Shaftesbury

REMEMBER – *All safeguarding concerns, regardless of whether the duty of candour applies, should be reported under the safeguarding procedure as set out in the Shaftesbury Education Safeguarding Reporting Procedure and the local setting's Safeguarding Protocol.*

The policy - Communication with Relatives, Advocates, Friends and Carers - provides specific guidance on how incidents should be communicated to meet the Duty of Candour.

Reflections and Lessons Learnt

All safeguarding cases above 'minor' will be followed by the debriefing and lessons learnt process – see the Debriefing Policy and Procedure.

Implementation

Each LA has its own safeguarding procedure. Every setting has its own Local Safeguarding Protocol. Every setting has a copy of the procedure for their LA area referenced in the protocol for their setting. The LA safeguarding team will provide DSLs and setting leaders with advice and guidance about the application of our safeguarding policies and procedures to ensure they meet local requirements.

Shaftesbury Education ensures that managers and staff are able to carry out the requirements of this policy by:

- Being trained and competent in line with best practice.
- Being informed of relevant sources of support and information.
- Having a clear understanding of what constitutes poor practice, the implications of poor practice and benefits of good practice.
- Being supported by other staff and managers, and with necessary resources.
- Monitoring staff competency in the application of this procedure and acting appropriately to respond to any shortfalls
- Completing periodic refresher briefings on the content of safeguarding policies and procedures.
- Ensuring briefings and training for all new staff as part of induction.
- Ensuring regular audits of the application of the procedure – by checking and monitoring mechanisms including record keeping, against the standards set out in the procedure.

© Copyright Shaftesbury

- Displaying the safeguarding poster – see Appendix B - in all workplaces.
- Ensuring that managers and staff are aware of the potential signs of abuse, and that they know what to do to raise a concern. This will be monitored as part of the Shaftesbury quality process through periodic checks, audits and direct staff questioning.
- Reviewing data on safeguarding concerns raised and responses to concerns through the safeguarding forum and Trustee safeguarding board.

Related Policies, Procedures and Protocols

This procedure should be read in conjunction with the following documents.

- Shaftesbury Education Safeguarding Children Policy
- Shaftesbury Education Safeguarding Reporting Procedure
- Setting-specific Local Safeguarding Protocols
- Location-specific LA safeguarding procedures
- Shaftesbury Safeguarding Children in an Adult setting Policy
- Shaftesbury Education Prevent Duty Policy
- Shaftesbury Education Online Safety Policy
- Individual Online Safety and Prevent Risk Assessments
- Shaftesbury Whistleblowing and Raising Concerns Policy
- Shaftesbury Mental Capacity Act Policy and Procedure
- Shaftesbury Lone Working Policy
- Shaftesbury Disciplinary Policy
- Shaftesbury Education Recruitment and Selection Policy
- Shaftesbury Education Student Attendance Policy
- Shaftesbury Education Positive Behaviour Support Policy
- Shaftesbury Education Peer-on-Peer Abuse Policy

© Copyright Shaftesbury

- Shaftesbury Education Managing Allegations Against Staff Policy
- Shaftesbury Staff Code of Conduct
- Shaftesbury Education Physical Intervention Procedure
- Shaftesbury Education Physical Touch Procedure
- Shaftesbury Intimate Care and Clinical Tasks Policy
- Shaftesbury Education Relationships and Sex Education Policy

The above policies and procedures are located on the Shaftesbury intranet: 7net – Shaftesbury Intranet

© Copyright Shaftesbury

Policy Ownership

Name	Version
Safeguarding Adults Policy	2.0

Date published	Date for next review
September 2026	September 2027

Approved by	Date
Shaftesbury Safeguarding & Services Quality Committee	8th September 2026

History	Date	Author	Reason
7.0	November 2024	Jane Percy	Combined with Safeguarding Adults Policy and minor amends
7.1	January 2025	Adele Audin	Minor amends for Education specific content.
7.2	March 2025	Adele Audin	Education Version Completed
1.0	November 2025	Adele Audin	New Education Version
2.0	September 2026	Adele Audin	Updated with NSPCC review

© Copyright Shaftesbury

Appendix A – Safeguarding Levels Criteria

Appendix A - Safeguarding Levels Criteria

Link: **Safeguarding Types of Abuse Severity Matrix**

Appendix B – Safeguarding Posters

Appendix B1 – Safeguarding Poster template

Link: **Safeguarding Poster**

Appendix B2 – Local Safeguarding Posters

© Copyright Shaftesbury

Shaftesbury Millie College:

SAFEGUARDING

Shaftesbury Millie College

If you witness or suspect harm, or have a concern, you must:

ACT IMMEDIATELY and speak to one of the following Designated Safeguarding Leads below within **one hour**:

Geoff Lively
Deputy Principal
Designated Safeguarding Lead DSL

Emma Browning
Pastoral & Wellbeing Lead
Deputy Designated Safeguarding Lead

Rebecca Burgess
MDT Lead
Deputy Designated Safeguarding Lead

Mike Gamble
Assistant Principal
Deputy Designated Safeguarding Lead

If you see or hear something that:	If you witness a member of Staff:
• Concerns you that a young person may be at risk • Makes you feel uneasy or worried about a young person • Suggests something is not right, even if you are unsure • Raises a concern about a young person's safety or wellbeing	• Behaving in a way that has harmed or may harm a young person • Possibly committing a criminal offence against or relating to a young person • Behaving in a way towards a young person in a manner that suggests they are unsuitable to work with young people
Speak to a member of the **Safeguarding Team** within **one hour**. **Record** your concern onto **CPOMS or Cause for Concern form** (the safeguarding team member will direct you to the correct recording system)	

For further information and contacts Safeguarding policy documents can be found on our website and in our safeguarding stations

© Copyright Shaftesbury

Shaftesbury Nash College:

Shaftesbury Nash College

COLLEGE SAFEGUARDING

REPORT ANY CONCERNS ABOUT A STUDENT'S WELFARE TO A SAFEGUARDING OFFICER

Mo Obadare
x203 or 07803 623457
Head of People & Student Welfare;
Designated Safeguarding Lead

Kristal Nicholson
07834 176829
Pastoral Support Team Lead;
Deputy Designated
Safeguarding Lead

Martin Bentham
x299 or 07885 687910
Head of College

If you have a concern about a college student you must speak to a member of this team IMMEDIATELY.
If you are unable to get hold of anyone from this team, please contact Adele Audin, Shaftesbury Safeguarding contact, on 07976584290.

© Copyright Shaftesbury

Shaftesbury Victoria School:

PRINT DATE: 11.09.26 KCSIE 2026 VERSION

Safeguarding

Victoria School Shaftesbury

If you witness or suspect harm, or have a concern, you **MUST: ACT IMMEDIATELY** and speak to one of the following:

Designated Safeguarding Leads

Daniel Pitt
(DSL)
SLT Corridor
Ext: 266
M: 07889 154 303

Victoria Pudney
(DSL)
SLT Corridor
Ext: 262
M: 07889 154 308

Jake Line
(DSL)
Carmel House
Ext: 290
M: 07525 807 664

Deputy Designated Safeguarding Leads

Sean Mogg
(Deputy DSL)
Carmel House
Ext: 221
M: 07889 154 310

Gemma Mallett
(Deputy DSL)
Behind Reception
Ext: 296
M: 07889 154 326

Nikki Nabney
(Deputy DSL)
Nurses' Office
Ext: 226
M: 07889 154 324

Olu' Odunsi
(Deputy DSL)
Headteacher
Ext: 291
M: 07925 357825

- **Everyone should have access to CPOMS.** If there are any issues, **speak to a member of the Safeguarding Team.**
- If you are unsure whether to report something on CPOMS, **speak to a member of the Safeguarding Team**
- Do not confront or report anything to the person you suspect; this could prejudice any enquiry that may follow.
- If you are unable to access CPOMS, use a *Cause for Concern* Form and **hand it to a member of the Safeguarding Team within 1 hour of the concern being raised**
- If staffing levels are a concern at a particular point in the day, use the orange NurseCall Button (see image)

- Call for assistance on channel **3** on a radio or call Reception on Ext: **200**
- If the person you suspect is on the above list or close to someone on the list, go straight to the next person named. If your concerns relate to the above team or leadership of safeguarding within the school, please contact:

Adele Audin – Director of Education: 020 8315 4800/aaudin@shaftesburygroup.org

BCP Children's First Response Hub: 01202 123334 BCP Adults' Social Care: 01202 123654

BCP Local Authority Designated Officer (LADO): 01202 817600 NSPCC: 0808 800 5000

If you witness a member of staff

- behaving in a way that has harmed or may harm a child
- possibly committing a criminal offence against or relating to a child
- behaving in a way towards a child in a manner that suggests she/he is unsuitable to work with children:

Report this immediately to the Headteacher/Principal or appropriate alternative route, and to the LADO where relevant.

Ensure safety of child → File a cause for concern through a Cause for Concern Form → Inform your DSL or line manager immediately → Be assured that your concern is being taken seriously

Safeguarding is everyone's responsibility. Always be professionally curious.

© Copyright Shaftesbury