# SAFEGUARDING AT CITY

Policy and Process documents for Safeguarding Children and Adults at Risk

## CONTENTS

## 1.    POLICY STATEMENT

1.1    City, University of London is committed to providing a safe and secure learning and working environment for all students, staff and visitors.

1.2    City, University of London (City) recognises that it has statutory safeguarding responsibilities to ensure that its students, young persons and adults at risk accessing its services and facilities or involved in activities such as research or Taster weeks, are safeguarded against abuse.

1.3    City also recognises that young persons and adults at risk may suffer harm from sources outside City's control. Where signs of such harm are apparent City will ensure that there are mechanisms in place to provide appropriate advice and support and where required for concerns to be reported to the appropriate external agency.

1.4    Safeguarding also requires City to take all reasonable measures to ensure that risk of harm to a child is minimised and City has a Code of Practice, **See Annex A** and procedures in place to safeguard children.

1.5    This Policy sets out City's commitment to a proactive approach towards achieving the outcomes referred to in it through continued good practice, sound processes and regular training and communication.


## 2.    SCOPE OF THE POLICY

2.1    This policy applies to all aspects of child protection and safeguarding responsibilities within the work of City, University of London.


2.2    The Safeguarding at City Policy applies to all staff, students, visitors and volunteers who encounter children, young people, and adults with care and support needs as part of University activities, this includes all staff and students of City, including those who do not have a specific role in relation to safeguarding children;

- City's academic partners, including those operating under franchise arrangements;
- all online interactions across channels/platforms used for official City business by staff, students and visitors;
- summer schools, school visits, and other activities;
- outreach or widening participation activities taking place on or off campus;
- student accommodation;
- research activities;
- public events and conferences;
- placements, volunteering and other professional activities;
- field trips, excursions and other volunteering activities;
- City Students' Union;
- Contracted agents of City;
- admissions and admissions policy;
- contractors.


2.3    **Under 18's** – City has a duty of care towards all our students, employees and visitors

and in the case of students joining before their 18ᵗʰ birthday this duty is enhanced as students under 18 are regarded as children under English law. As such, the University has arrangements in place, which safeguard and promote the welfare of children.

2.4 **Apprenticeships** - The University proactively recruits Apprentices across a number of Programmes which are therefore regulated by Ofsted. City is required to demonstrate effective safeguarding procedures are followed to keep apprentices safe from abuse, neglect and exploitation. Apprenticeship students are briefed about Safeguarding and Prevent responsibilities as part of their induction and throughout their programme through the regular tri-partite conversations where apprentices are given clear information about who to contact if they have Safeguarding or Prevent concerns about themselves or others.

2.5 **Placements** - There will be occasions, particularly with Placement providers, where staff, students and/or volunteers will be working off campus with a host organisation. When this is the case, it is imperative that the City, University of London representatives have familiarised themselves with the host organisations safeguarding procedures and follow them.

2.6 **Widening Participation (WP) and Outreach activity** – All WP activity and outreach work is delivered within specific WP safeguarding guidance that ensures:

- All staff, tutors and ambassadors have received safeguarding and working with young people training
- All events have been risk assessed and that includes safeguarding

2.7 **Partnership Providers** - The University has partnerships with other national and international education providers and when students are studying, or staff are working at these providers they will adhere to their safeguarding procedures. Any safeguarding concerns should be reported to the Safeguarding Officer in the partner institution. If the employee or student feels that this is inappropriate or they do not feel they have had a satisfactory response, they should refer directly to the central safeguarding team at City where the Designated Safeguarding Lead (DSL) will make an assessment.

2.8 **Research activity -** The University recognises that safeguarding issues may arise in various research settings, with some research involving children or vulnerable adults. Research projects must obtain ethical approval before the research commences and City's Research Ethics Committees use a Risk Level Checklist to assess whether a research project is high-risk, such projects receive scrutiny from more experienced research ethics committees. The Governance & Integrity Manager is the Designated Safeguarding Officer (DSO) for any safeguarding issues that arise in the research setting.

2.9 **Urdang Academy** – Urdang Academy has a Safeguarding and Child Protection Policy that should be read in conjunction with City's overarching Safeguarding at City Policy, of which it is aligned to, including the associated reporting and accountability structure.

2.10 **INTO** – INTO City has a [Safeguarding Policy](#) that should be read in conjunction with City's overarching Safeguarding at City Policy, of which it is aligned to and including the associated reporting and accountability structure.

## 3.    POLICY CONTEXT

Safeguarding Children, Adults at Risk and Radicalisation:

3.1 The prime responsibility in the field of child protection and adults at risk lies with the Police and Social Care Services. The Children Act 1989 places a duty on local

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authorities to take steps to protect children in appropriate circumstances and gives powers to the Police so that they can take action to protect children.

3.2 The government guidance on child protection is set out in a document published by the Department of Health "Working together under the Children Act 1989". It is stated in this document that all staff in the education service should be aware of the need to alert the Social Care Services, the NSPCC or the police, when they believe a child has been abused or is at risk of abuse.

3.3 The Care Act (2014) defined the statutory framework for adult safeguarding. It sets out the legal framework for how local authorities and services in the health and social care setting should protect adults at risk of abuse or neglect. Under the 2014 Care Act the legal responsibility for safeguarding adults at risk of arm sits with the local authority in which the adult resides.

3.4 As a result of the Safeguarding Vulnerable Groups Act 2006 employers, local authorities, professional regulators and inspection bodies have a duty to refer to the Disclosure and Barring Service (DBS) any information about an individual where they consider them to have caused harm or pose a risk of harm to vulnerable groups.

3.5 The Counter-Terrorism and Security Act 2015 places legal duties on City to have due regard to the need to prevent people from being drawn into terrorism. In practice this requires City to have processes and procedures in place to help support individuals at risk of being radicalised. This requires City to engage in Prevent, part of the Government's counter-terrorism strategy, which aims to reduce the threat to the UK from terrorist attacks by stopping people from being drawn into terrorism. This includes, but is not limited to, the identification and referral of those at risk of being drawn into terrorism into appropriate interventions aimed to divert vulnerable people from radicalisation.

3.6 The Counter-Terrorism and Security Act 2015 and other terrorism-related legislation contains very particular definitions. These definitions are used in this Policy and are as follows:

**Terrorism** – the use or threat of action designed to influence the government or an international government organisation or to intimidate the public, or a section of the public, made for the purposes of advancing a political, religious, racial or ideological cause and it involves or causes:

- Serious violence against a person
- Serious damage to a property
- A threat to a person's life
- A serious risk to the health and safety of the public: or
- Serious interference with or a disruption to an electronic system

**Extremism** – extremist beliefs are those which directly contravene values which are fundamental to British culture and society.

**Radicalisation** – a process whereby someone has their vulnerabilities or susceptibilities exploited towards terrorism or crime – most often by a third party with their own agenda.

3.7 City recognises the positive contribution it can make towards protecting its students and staff from radicalisation to violent extremism. City will endeavour to support and

empower its students and staff to create communities that are resilient to extremism and to protect the wellbeing of individuals who may be vulnerable to being drawn into violent extremism or crime. At the same time, it will endeavour to promote the development of spaces for free debate within the law where the principles of academic freedom and freedom of speech can be upheld, see **Freedom of Speech Policy**

3.8     As they primarily relate to vulnerable students, Prevent duties are a form of safeguarding and are therefore contained in this Safeguarding Policy. However, due to the specialist and sensitive nature of the duties there is a separate safeguarding procedure for Prevent Duties, **see Annex G** to this Policy.


## 4.     RESPONSIBILITIES

4.1     Safeguarding is everyone's responsibility. All members of staff, students, visitors and volunteers involved in City, University of London activity are in a position of trust and have a duty of care to act if there is a cause for concern.

4.2     City is committed to working together with the Local Safeguarding Boards (LSCB), Islington Prevent Partnership Board, London Higher Education Prevent Network and other external agencies and to comply with their local procedures.

4.3     City recognises that it has a responsibility towards all children and adults at risk attending or visiting City, to safeguard their welfare and to take appropriate steps to ensure this can be achieved.

4.4     City has written guidance, policies and procedures for staff and students responsible for activities involving children and adults at risk.

4.5     City has written guidance on risk assessments.

4.6     Responsibilities of City's staff and students are set out below:


| Body | Responsibilities |
|---|---|
| **Council**<br>City's' governing body | Council is the supreme governing body of City, with ultimate responsibility for the affairs of City. In relation to Safeguarding, it exercises its functions by:<br>• approving the Safeguarding at City Policy<br>• approving the OfS Annual Monitoring Prevent Report<br>• receiving assurance that staff are trained to the appropriate levels<br>• receiving risk registers<br>• maintaining up to date training<br>• receiving the outcomes of periodic reviews/audits |
| **Audit and Risk Committee** | Responsible for:<br>• Receiving reports from the Safeguarding and Prevent Steering Group |
| **Principal Designated Safeguarding Officer (PDSO)** | Responsible for:<br>• Oversight of reports to the Office for Students (OfS) as requested by the Designated Safeguarding Lead<br>• Recommending the Safeguarding at City Policy to Senior Leadership Team and Council for approval |

| | |
|---|---|
| Chief Operating Officer | • Convene an annual Safeguarding and Prevent Steering Group for all senior Safeguarding contacts across City, University of London. |
| **Designated Safeguarding Lead (DSL)** Head of Student Support Services | Responsible for: <br> • Completion and submission of reports to the Office for Students (OfS) as required <br> • Ensuring the Safeguarding at City Policy is kept up to date, is accompanied by appropriate formal procedural arrangements and is implemented across the University <br> • Oversight of some investigations of allegations and other disclosures in conjunction with Designated Safeguarding Officers, Professional Services teams and other relevant external agencies <br> • Ensuring that there is a robust network of Designated Safeguarding Officers across the University <br> • Investigating any non-compliance with the Safeguarding at City Policy <br> • ensuring effective communication to staff and students of Safeguarding at City Policy. <br> • Ensuring appropriate training is available to all staff, commensurate with their role and responsibilities, and for ensuring the training is evaluated and kept up to date <br> • Ensuring appropriate mechanisms are in place for recording and reporting safeguarding incidents, in accordance with the Universities Data Protection Policy <br> • Holding the central records of safeguarding incidents <br> • Ensuring required risk assessments are conducted and appropriate and acted upon <br> • Attending high level training commensurate with the responsibilities of the DSL <br> • Chairing the Safeguarding Community of Practice Operational Group <br> • Providing Safeguarding and Prevent annual reports to the Senior Leadership Team and Council and its subcommittees as required |
| **Designated Safeguarding Officers (DSO)** | Responsible for: <br> • Responding to students and staff of concern when raised under the Safeguarding at City Policy <br> • Responding to safeguarding incidents, including referrals to local agencies and/or referrals to internal procedures as appropriate <br> • Providing advice to colleagues in Schools or Professional Services teams on safeguarding concerns/incidents <br> • Assisting in the promotion of the Safeguarding Policy and written procedure <br> • Attending required training where appropriate <br> • Ensuring appropriate recording and onward internal reporting of safeguarding concerns and |

| | |
|---|---|
| | incidents to the Designated Safeguarding Lead when required<br>• Attendance at Safeguarding Community of Practice Operational Group |
| **Prevent and Safeguarding Steering Group** | • provide strategic direction and make recommendations to the Senior Leadership Team and Council to ensure the Institution's compliance with the university's policies for safeguarding children and adults at risk, including the 'Prevent duty';<br>• monitor City's Prevent Risk Assessment annually and as needed, and keep the Audit and Risk Committee informed of the Institution's Prevent risks;<br>• monitor City's Prevent Action Plan annually and as needed, in response to identified risks, statutory and regulatory requirements as well as best practice;<br>• review City's Prevent Annual Return to the Office for Students, on behalf of the Senior Leadership Team and Council;<br>• monitor, where relevant, the implementation and effectiveness of City's Safeguarding and Prevent related policies and operational processes;<br>• ensure that appropriate data is collected/reported about Safeguarding and welfare matters, in a way that supports City's statutory and regulatory roles;<br>• monitor the delivery of Safeguarding and Prevent training at the Institution;<br>• review annual reports on lessons learned, and trends, in safeguarding cases';<br>• keep the Senior Leadership Team, Council, the Equality Committee, the Audit and Risk Committee and the Safeguarding Community of Practice Operational Group informed of internal and external developments relating to relevant 'Prevent duty';<br>• identify and disseminate good practice to staff and students at the Institution;<br>• where relevant, receive and respond to reports from identified partners. |
| **Prevent and Safeguarding Working Group** | • oversee the development, implementation and monitoring of systems, processes and policies relating to Safeguarding Children, adults at risk and Prevent Duty;<br>• ensure members of City and those entering its premises or using its facilities understand the full scope of their responsibilities concerning Safeguarding Children, adults at risk and Prevent Duty;<br>• agree quality standards, develop audit tools and develop a training strategy, which supports sound arrangements for Safeguarding Children, adults at risk and Prevent Duty; |

| | |
|---|---|
| | • confidentially (where appropriate) feedback the outcomes of case reviews following a reported incident concerning a child or adults at risk;<br>• implement and review recommendations in relation to practice as directed by the City's Health and Safety Committee and the Safeguarding and Steering Group or the local authority's child/vulnerable protection bodies [such as Islington Social Services];<br>• ensure that appropriate data is collected about Safeguarding and welfare activities in a way that supports City's statutory and regulatory roles;<br>• ensure City responds appropriately to changes in relevant legislation;<br>• identify, respond and escalate, as appropriate, any organisational risk relating to Safeguarding and welfare at City; |
| **All staff (**including staff not on a City contract - VL, student staff, graduate assistants, etc.) | Responsible for:<br>• Helping to ensure the University is a safe environment, free from prejudice, discrimination, bullying and harassment by ensuring compliance with City's expected behaviours and values<br>• Awareness of the Safeguarding at City Policy and related procedures and how to raise a safeguarding concern or disclosure under it<br>• Attending training relating to safeguarding as requested<br>• Ensuring safeguarding responsibilities are reflected in event planning and risk assessments for University activities in accordance with Health and Safety procedures<br>• Co-operating with any internal or external investigations carried out into reported concerns<br>• Reporting any concerns, suspicions or information regarding safeguarding violations to the appropriate staff<br>• Maintaining the confidentiality of any suspected or actual incidents<br>• Ensuring awareness of local safeguarding policies and procedures for the external premises being visited when representing the University |

## 5. Safer recruitment and selection

5.1 As part of its recruitment and selection processes, City has robust systems in place to ensure pre-employment checks via the Disclosure and Barring Service (DBS) are undertaken where a role will involve regular one-to-one contact with children and young people under the age of 18, or with adults at risk (18 years and over).  Further guidance is available on the Pre-Employment pages of City's Recruitment Guidance.

5.2 Where the role description of an existing member of staff changes to encompass regular

one-to-one contact with children, or with adults at risk, a DBS check may be required.  In these circumstances, local HR Team will be available to provide further information and guidance on the level of check required, and the process to be followed.

**6.     Other relevant Policies and Procedures**

6.1    When there are concerns about the wellbeing or the safety of students or staff who are not categorised as children, young people or adults with care and support needs but where a safeguarding or welfare risk has been identified, there are other policies and procedures that might also be relevant. These include:

   a. Fitness to Study
   b. Fitness to Practice
   c. Student Sexual Misconduct Policy
   d. Student Harassment and Bullying Policy
   e. Student Disciplinary Policy
   f. Data Protection Policy
   g. Privacy notice for students
   h. Privacy notice for staff
   i. Privacy notice for Alumni
   j. Student Attendance Policy
   k. Freedom of Speech Policy
   l. Health and Safety Policy
   m. University Admissions Policy: Under 18 students
   n. Professional Personal Relationships Policy
   o. Young Persons in the Workplace

**7.     Training and Support**

7.1    The University requires all new and existing staff members to complete the 'Safeguarding' and 'Prevent' online training modules - Staff training & development (sharepoint.com)

7.2    The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will be trained to Level 4 - Designated Safeguarding Officer. Refresher training is required every two years.

7.3    The Designated Safeguarding Officers will be trained as Level 1/2 – Designated Safeguarding Contact. Refresher training is required every two years.

7.4    The University is committed to providing appropriate opportunities for guidance and training on this policy and related procedures.

**8.     Monitoring and Review**

8.1    The Principal Designated Safeguarding Officer (PDSO) will convene an annual Safeguarding and Prevent Steering Group for all senior Safeguarding contacts across City, University of London.

8.2    The Designated Safeguarding Lead (DSL) will convene a Safeguarding Community of Practice Group, twice a year to include all operational contacts and any other relevant stakeholders to share and review student safeguarding practice at City, University of London.

8.3    These meetings will also annually review the Safeguarding at City Policy and when appropriate make recommendations for revisions.

# SAFEGUARDING AT CITY

Process documents for Safeguarding Children and Adults at Risk

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**ANNEXES:**

## SAFEGUARDING CHILDREN
CODE OF PRACTICE

This Code of Practice and Guidelines sets out City's practices and procedures for securing the safety and welfare of children and young people on City's premises or engaging in activities controlled by City.

### 1. ACTIVITIES INVOLVING CHILDREN OR YOUNG PEOPLE

This could include**:**

- Research;
- Taster weeks/ events/widening participation activities/open days;
- Admission of student under 18;
- Apprentices under 18 years of age;
- Clinical work/ degree.

Schools and Professional Service directorates planning activities which may involve children and young people are to develop appropriate procedures for ensuring the activities are competently supervised and the criteria set out in this Code of Practice are met in full. See flow chart for activities involving children and young people (Annex C). They should also ensure they follow the guidance available in the Safety Procedures on Events Management.

### 2. ROLES AND RESPONSIBILITIES

It is not the responsibility of City to investigate abuse. However, it has a duty to act if there is cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.

City should consider the implications of any issue raised and should consider whether it is necessary to take further action itself or to review or amend its procedures. The guidelines on responding to an allegation of child abuse, **Annex B** and associated flow chart gives a framework for decision making and action. **Annex G** provides a framework for staff and students in relation to City's Prevent Duties.

### 3. DESIGNATED SAFEGUARDING OFFICERS

All of City's Safeguarding contacts are set out in **Annex H**.

The nominated staff, with responsibility for Safeguarding Children are:

- **Designated Safeguarding Lead (DSL)**
  It is the role of the DSL to act as a source of support and guidance on all matters of child protection and safeguarding within City. The Student Safeguarding Manager deputises as DSL in the absence of the Designated Safeguarding Lead.

- **Human Resources (HR) Safeguarding Leads**
  The Deputy Director of HR and the HR Lead for Policy Development and Projects are responsible for dealing with allegations specifically against a member of staff.

- **Designated Safeguarding Officers (DSO)**
  Each School and Professional Services Directorate has a nominated DSO who should be the first point of contact locally on all safeguarding matters and who will advise on who within City can provide expert safeguarding advice.

## 4.  GOOD PRACTICE GUIDELINES FOR STAFF AND STUDENTS

It is recommended that staff and students take steps to ensure that they do not put themselves in a position where an allegation can be made against them. Therefore, staff should give special consideration to ensuring that they do not become involved in circumstances where an allegation can be raised.

Such consideration might involve, but is by no means limited to:

a. Treating students with respect and dignity at all times, reflecting their age, background, culture and special needs;
b. Ensuring that interaction with students/young people occurs in the company of others wherever possible;
c. Retaining a professional approach to students which will involve behaviour such as not divulging home telephone numbers or addresses, ensuring there is not physical contact, avoiding inappropriate familiarity, including discussing matters of a sexual nature, losing self-control and being sensitive to issues that can be misconstrued;
d. Discussing potential concerns with the Local Safeguarding Lead or Dean of School/Head of department before an allegation can be raised;
e. Contact with a student may need to involve a colleague to ensure an allegation of improper behaviour cannot arise.

These recommendations for staff will usually apply to those students under the age of 18 years. However, it may also apply to adults at risk and students over the age of 18.

## 5.  RESEARCH

Staff and students undertaking research that involves children or young people need to ensure they comply with this policy as well as the relevant legislation. They are also required to obtain a Disclosure and Barring (DBS) enhanced disclosure. The Senate Research Ethics Committee offer further guidance.

## 6.  TRAINING

The DSL in conjunction with Organisational Development will provide a programme of training for nominated staff with child protection responsibilities and for staff responsible for activities involving children, including those who undertake research with children.

## 7. DISSEMINATION OF CITY'S SAFEGUARDING POLICY

The Policy is available for reference on City's Governance website and the HR website.

All parties who fall within the scope of City's Safeguarding Policy, including contractors and academic partners, will be provided with a copy of this Policy and all contractual relationships with parties covered by this Policy shall require compliance with this Policy at all times.

Parents of children involved in activities related to City will be offered access to the policy.


## 8. STORAGE OF RECORDS

The DSL shall retain a copy of:

- Any report received concerning child abuse
- Any report sent to social services or police
- Any notes, memoranda or correspondence dealing with the matter
- Any other relevant material

Copies of reports and other documents should be stored securely at all times.
In compliance with the Data Protection Act the records will be stored for 25 years.

All other records shall be kept in accordance with the provisions of this Policy.


## 9. FORMS

**Form CP-A** Record of Allegation of Child Abuse – **SEE BELOW**
**Form CP-B** Safeguarding Children: Referral to Social Care Services – **SEE BELOW**


## 10. STATUTORY GUIDANCE

- Working together to Safeguard Children (2015)
- The Children Act (1989 & 2004)
- The Care Act 2014
- Protection of Freedoms Act (2012)
- London Child Protection Procedures 5th Edition (2015)
- Keeping Children Safe in Education (2015)
- Health and Safety at Work Act 1974
- Health and Safety (Young Persons) Regulations 1997
- Management of Health and Safety at Work Regulations (1992)
- Vetting and Barring Scheme Guidance Home Office (2010)
- The Mental Capacity Act (2005)

**Form CP- A**

**RECORD OF ALLEGATION/SUSPICION OF CHILD ABUSE**

**Date**…………….…………..**Time of Initial Call**……………………….………….………

**To:** Safeguarding Lead (Name)………………………………………………………….

| Name of Complainant | Name of Young Person and School (if applicable) | Place of Alleged Abuse |
|---|---|---|
|  |  |  |

**Name(s) of people present**

**Details of Allegation**
The account of the allegation as given by the complainant, this should include any injuries observed

**Name of Person reporting Incident** (capitals)……………………………………………..

**Signed**…………………………….. **Date**……………………………………………..

**Designation**………………………………………………………………………………..

**Department**…………………………………**Ext No**……………………………………..

**Email Address**………………………………………………………………………………

**Form CP-B**

| SOCIAL CARE SERVICES REFERRAL FORM |
| --- |
| Telephone Referral made on:       Date………………….. <br><br>                        Time………………….. <br><br> To: Social Worker/ Duty Officer (Name)……………………… |

| Name of Young Person(s) | Date of Birth | School/Institution |
| --- | --- | --- |
| 1. <br><br> 2. <br><br> 3. | | |

**Address**………………………………………………………………………………………
…..

……………………………………………………..**Tel**
**No**…………………………………

**Reason for Referral/Information**




**From: Name (Please**
**Print)**…………………………………………………………………

Signed…………………………………
Designation…………………………………………

Please send this referral form to the Social Services within 24 hours of initial
telephone contact

**Annex B**

**GUIDELINES FOR RESPONDING TO A SAFEGUARDING CONCERN**

1. **INTRODUCTION**

   It is important that children, young people and adults at risk are protected from abuse. All complaints, allegations or suspicion must be taken seriously. These guidelines must be followed whenever an **allegation** is made that a child or adult at risk has been abused or when there is a **suspicion** that they have been abused or are at risk of abuse.

   All allegations of abuse or potential abuse must be dealt with in a discrete and sensitive way that respects confidentiality and data protection requirements. However, promises of absolute confidentiality cannot be given as the matter may develop in such a way that these cannot be honoured.

2. **PROCEDURE WHEN ABUSE OF AN ADULT AT RISK IS SUSPECTED**

   Any concerns should initially be discussed with the appropriate Designated Safeguarding Officer (DSO) or Designated Safeguarding Lead (DSL), **see Annex H** for contact details. The DSO/DSL will advise on any immediate actions that need to be taken and refer the concerned member of staff or student to the appropriate person within City if necessary. Specific procedures for safeguarding issues arising out of City's Prevent Duties are set out in **Annex G**.

   Members of staff or students are not expected to liaise with external agencies. If external agencies need to be involved, then the DSO will refer the concern to the DSL or PSL who will manage liaison with the appropriate external agency.

3. **PROCEDURE WHEN CHILD ABUSE IS SUSPECTED**

   City has a Code of Practice for safeguarding children, **see Annex A**, which forms part of this Policy.

   The member of staff or student with concerns about possible child abuse must make a full record of the nature of the incident/allegation and any other relevant information as soon as possible. Form CP-A: Record of Allegation of Child Abuse should be used, **Annex A**. If the complainant is the child directly impacted by the alleged abuse, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. The use of leading questions can cause problems for the subsequent investigation and court proceedings. Some children with Learning Difficulties may need different treatment from other children e.g., in the way their physical/mental condition might mask possible abuse. Particular attention may have to be given to children with speech impediments as these can make communication difficult.

   Any suspicion, allegation or incident of abuse must be reported to the Principal Designated Safeguarding Officer (PDSO) as soon as possible and in any event within 2 hours, **see Annex H** for contact details.

   The DSL must contact the local Social Care Services Department as a matter of urgency whether or not they feel this action is justified in the particular circumstances of the case. The matter will be reported over the telephone to the duty social worker (or such other

person as required by the Local Safeguarding Children Boards (LSCB) procedures). In the unlikely event that social services cannot be reached the relevant Police Child Protection team for the area will be contacted

A written record of the report will be retained by the DSL. The written record will note the date and time of the report and must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant Social Services department within 24 hours using Form CP-B Child Protection: Referral to Social Care Services.

## 4. NOTIFICATION OF PARENTS

The DSL should discuss with the Social Care Services Department what action will be taken to inform the parents of the child and a note of that conversation should be made. The DSL is not expected to undertake that role.

## 5. ALLEGATIONS AGAINST A STUDENT

Where the allegation or apparent abuse of a child is by a student engaged in activities related to City, the process in this Annex B should be followed and the DSO for the School where the student is registered must be informed within 2 hours of the initial concern arising so that the School can instigate City's student disciplinary procedures.

## 6. ALLEGATIONS AGAINST A MEMBER OF STAFF

In the event that there is any suspicion, allegation or apparent abuse of a child by a member of staff the matter should be reported to the DSO in HR for staff as detailed in this Policy as soon as possible. If within 2 hours of the initial concern arising, it has not been possible to contact the safeguarding lead in HR, it must be reported to the Director of HR. Outside normal hours reports should be made to the Duty Manager.

On being notified of any such matter the Safeguarding Lead in HR shall:

    a. take such steps as he/she considers necessary to ensure the safety of the child in question and any other child who might be at risk
    b. liaise with the person or organisational representative who reported the original concern and ensure that a report of the matter is completed
    c. report the incident to the Local Authority Designated Officer (LADO) for Islington according to guidance on the Islington Safeguarding Board website
    d. notify the Director of HR and relevant Dean or Director.

If the Director of HR is the subject of the allegation or complaint the matter must be reported direct to the President. If a complaint has been made against the President, the matter must be reported to the Chair of Council. If the DSL is the subject of the allegation or complaint the matter must be reported to the PDSO.

All staff should be aware of the fact that allegations may be made against them, and that the allegation may have grounds for substantiation or not. Any such

notification may result in immediate suspension of the member of staff and may result in the application of the Disciplinary Procedure where it is considered appropriate.
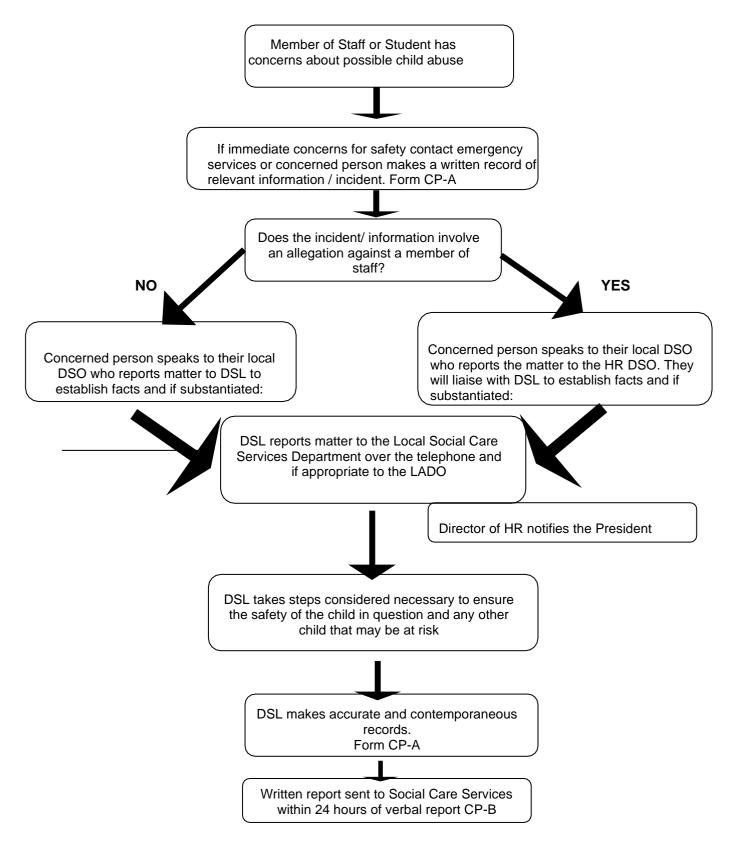
## 7. FORCED MARRIAGE/HONOR VIOLENCE/KILLINGS

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and duress is a factor. A young person who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the young person themselves, a member of the child's peer group, a relative or member of the child's local community or from another professional. Forced marriage may also become apparent when other family issues are addressed, e.g., domestic violence, self-harm, child abuse or neglect, family/young person conflict, a young person absent from City or missing/runaway. Forced marriage may involve the young person being taken out of the country for the ceremony and is likely to involve non-consensual sex. Refusal to go through with a forced marriage has often been linked to 'honour killing' or violence**.**

Honour based violence is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonoured their family. It is rooted in domestic violence and is often a conspiracy of family members and associates meaning victims are at risk from their parents and families.

Staff should respond to suspicions of a forced marriage or honour-based violence by first discussing their concerns with their DSO. The DSO will then, if appropriate, liaise with the DSL in order to make a referral to the Children's Services Contact Team and if the risk is acute, to the Police Child Abuse Investigation Team. Staff should not treat any allegations of forced marriage or honour-based violence as a domestic issue and send the child back to the family home. It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move the child and bring forward both travel arrangements and the marriage. For this reason, staff should not approach the family or family friends, or attempt to mediate between the child and family, as this will alert them to agency involvement. Guidance on dealing with concerns regarding forced marriage is contained in the Multi Agency Practice Guidelines 'Handling Cases of Forced Marriage'

**Annex C**

**WHAT TO DO IF YOU HAVE SAFEGUARDING CONCERNS IN RELATION TO A CHILD**

Member of Staff or Student has concerns about possible child abuse

↓

If immediate concerns for safety contact emergency services or concerned person makes a written record of relevant information / incident. Form CP-A

↓

Does the incident/ information involve an allegation against a member of staff?

**NO** →

Concerned person speaks to their local DSO who reports matter to DSL to establish facts and if substantiated:

**YES** →

Concerned person speaks to their local DSO who reports the matter to the HR DSO. They will liaise with DSL to establish facts and if substantiated:

DSL reports matter to the Local Social Care Services Department over the telephone and if appropriate to the LADO

Director of HR notifies the President

↓

DSL takes steps considered necessary to ensure the safety of the child in question and any other child that may be at risk

↓

DSL makes accurate and contemporaneous records.
Form CP-A

↓

Written report sent to Social Care Services within 24 hours of verbal report CP-B

**Annex D**

**FLOW CHART FOR ACTIVITY INVOLVING CHILDREN**

**Activity**
- Student admission onto Degree Course
- Taster weeks/ open days/events
- Staff bringing guests on site
- Research involving human subjects
- Clinical / course of study

↓

Could the activity involve young persons under 18? → What procedures (local or central) are in place to ensure **all** under 18s are identified before undertaking activity?

**YES**

↓

Does the activity involve young persons?

**YES**                    **NO**

↓ (YES)

**Actions**
1. Training for responsible staff (or students)
2. Provide copy of the Safeguarding Policy to all involved
3. Risk assessment
4. Ethical approval (research)
5. Additional support requirements
6. Consultation/communication with service providers e.g. security, accommodation, health.
7. Disclosure and Barring Service (DBS) checks

↓ (NO)

Ensure appropriate risk assessment undertaken

**Annex E**

**Whether to escalate a safeguarding concern – How to assess?**

**Is the student an 'adult at risk'?**
See Annex J & K for definitions

**Does the concern raised involve a form of abuse?**
See Annex J & K for definitions

**Is the student experiencing harm or are they at risk of harm if the safeguarding referral is made?**

Please consider:

- Students individual circumstances

- the nature and extent of the concerns

- the length of time it has been occuring

- the impact of the incident(s)

- the risk of repeated incidents impacting the student

- the risk of repeated incidents for others

**What does the student ('adult at risk') want to happen?**

Wherever possible, please consider the students wishes about what they want to happen next but do not promise confidentiality, sometimes it will be necessary to make a safeguarding referral against the wishes of the student at risk. Any decision made should be proportional to the risk, for example:

- it is in the public interest e.g. there is also risk to others

- the student lacks mental capacity to consent and it is in their best interests

- the person is being unduly influenced or intimidated to the extent that they are unable to give consent

- it is in the students vital interest to prevent serious harm or life threatening situations
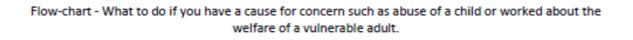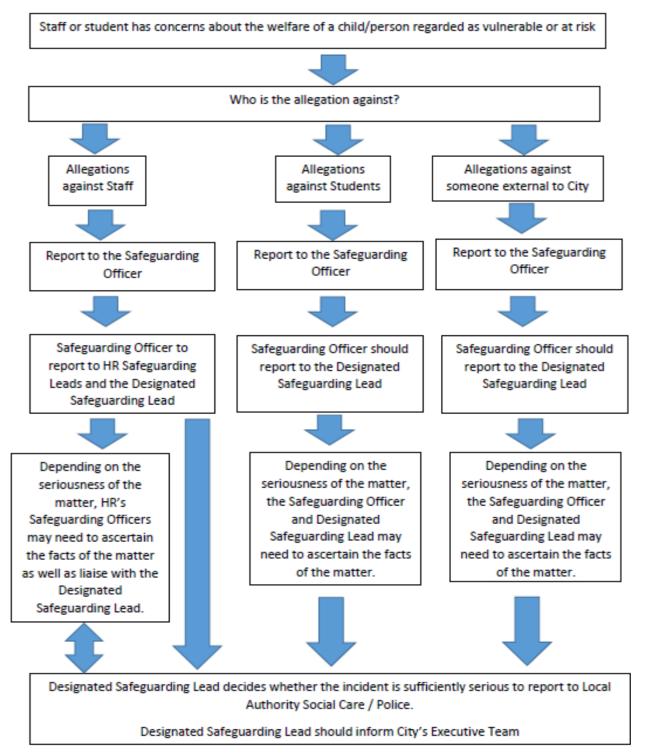
**Always record your actions and decisions.**

**If you are still unsure whether you should make a safeguarding referral, seek advice:**

See City's Safeguarding contact list, Annex H, for safeguarding contact details. You can have an anonymised conversation to decide whether the safeguarding concern needs to be acted upon and escalated accordingly.

**Annex F**

Flow-chart - What to do if you have a cause for concern such as abuse of a child or worked about the welfare of a vulnerable adult.

| Staff or student has concerns about the welfare of a child/person regarded as vulnerable or at risk |

↓

| Who is the allegation against? |

↓ ↓ ↓

| Allegations against Staff | Allegations against Students | Allegations against someone external to City |

↓ ↓ ↓

| Report to the Safeguarding Officer | Report to the Safeguarding Officer | Report to the Safeguarding Officer |

↓ ↓ ↓

| Safeguarding Officer to report to HR Safeguarding Leads and the Designated Safeguarding Lead | Safeguarding Officer should report to the Designated Safeguarding Lead | Safeguarding Officer should report to the Designated Safeguarding Lead |

↓ ↓ ↓

| Depending on the seriousness of the matter, HR's Safeguarding Officers may need to ascertain the facts of the matter as well as liaise with the Designated Safeguarding Lead. | Depending on the seriousness of the matter, the Safeguarding Officer and Designated Safeguarding Lead may need to ascertain the facts of the matter. | Depending on the seriousness of the matter, the Safeguarding Officer and Designated Safeguarding Lead may need to ascertain the facts of the matter. |

↓

| Designated Safeguarding Lead decides whether the incident is sufficiently serious to report to Local Authority Social Care / Police.<br><br>Designated Safeguarding Lead should inform City's Executive Team |

\*\*\* If staff, students or Safeguarding Officer are concerned about the Designated Safeguarding Lead, then they should contact HR's Safeguarding Officers only.  In such a case, HR's Safeguarding Officers will perform the role of the Designated Safeguarding Lead.

**Annex G**

**PREVENT SAFEGUARDING PROCESS**

**INTRODUCTION**

The Counter-Terrorism and Security Act 2015 ('the Act') places legal duties on City to have due regard to the need to prevent people from being drawn into terrorism. In practice this requires City to engage in Prevent, part of the Government's counter-terrorism strategy, have processes and procedures in place to help support people at risk of being radicalised and help to reduce the threat to the UK from terrorist attacks by stopping people from being drawn into terrorism. This includes, but is not limited to, the identification and referral of those at risk of being drawn into terrorism into appropriate interventions aimed to divert vulnerable people from radicalisation.

The UK's 'Prevent' counter-terrorism strategy is focused on providing practical help to stop people from being drawn into terrorism. The strategy covers all forms of terrorism, including right wing extremism and some aspects of non-violent extremism. People who are identified as being at risk of radicalisation are then offered support through the 'Channel' process, which is designed to assess the degree of vulnerability and risk and offer appropriate support.

> 'Channel' is not about reporting information on individuals in order to prosecute them, rather it is about communities working together to support vulnerable people. City will only recommend referral to 'Channel' when all steps in the Prevent Safeguarding Process have been completed.

## 1. PREVENT RESPONSIBILITIES

1.1 Prevent is the responsibility of ALL members of City staff. All staff must maintain an awareness of City's Prevent Duties and undertake relevant training where required.

1.2 Each School or Professional Services department will nominate a member of staff to be the Designated Safeguarding Officer (DSO).

1.3 The City Prevent Lead and Principal Designated Safeguarding Officer (PDSO) is the Chief Operating Officer or other nominee appointed by the President.

1.4 The City Operational Prevent Lead and Designated Safeguarding Officer is the Head of Student Support Services or other nominee appointed by Director of Student Experience.

1.5 All City Safeguarding and Prevent contacts are set out in **A H.**

## 2 RECOGNISING ISSUES

2.1 City recognises that reporting concerns about individuals under Prevent can be difficult and staff are not expected to be experts in recognising radicalisation. However, it is important to act if there are any concerns regarding the safety and welfare of students or staff, including concerns about potential extremist views.

2.2    There are a variety of reasons why people are attracted to extremist and terrorist activity and there is no exhaustive list of behaviours that may indicate an individual is at risk. Staff must use their professional judgement and consult with the relevant DSO either formally or informally if advice or guidance is needed.

2.3    However, issues which may indicate that a person is at risk include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

2.4    Some of these factors could indicate other issues which are not related to radicalisation, therefore this procedure should be considered alongside the broader safeguarding procedures set out in this Policy and other policies and procedures relating to student and staff welfare.


**3    REPORTING CONCERNS - STUDENTS**

3.1    In the event that a member of staff is concerned that a student is at risk of radicalisation, they should make a written report to the relevant DSO, providing details of the student and details of the issues which have caused concern, including evidence if available. If the member of staff has spoken to the student expressing those concerns, then a written record of that conversation should be kept and provided.

3.2    The DSO will consider the information provided and take advice from the City Operational Prevent Lead/DSL if necessary.

3.3    If, based on those discussions, the City Operational Prevent Lead/DSL takes the view that there is no material risk to the student then no further action will be taken.

3.4    If, based on those discussions, the City Operational Prevent Lead/DSL takes the view that there is sufficient cause for concern, then they will take advice from external agencies if necessary.

3.5    If, having consulted with the appropriate external agencies, the City Operational Prevent Lead/DSL takes the view that there is a material risk to the student, then the student will be referred to the City Channel Referral Panel which will consist of the City Prevent Lead, the Operational Prevent Lead and two other members appointed by the President.

3.6    The student will be informed that they have been referred to the Panel and the Panel's decision and reasons supporting that decision.

3.7    The City Operational Prevent Lead will only make a formal referral to Channel on the Panel's recommendation.

## 4 REPORTING CONCERNS - STAFF

4.1 In the event that a member of staff is at risk of radicalisation, a written report should be made to the HR DSO, providing details of the member of staff and the details of the issues which have caused concern, including evidence if available.

4.2 The HR DSO and Director of Human Resources will consider the information provided and take advice from the City Operational Prevent Lead/DSL if necessary.

4.3 If, based on those discussions, the City Operational Prevent Lead/DSL takes the view that there is no material risk to the member of staff then no further action will be taken.

4.4 If, based on those discussions, the City Operational Prevent Lead/DSL takes the view that there is sufficient cause for concern, then they will take advice from external agencies if necessary.

4.5 If, having consulted with the appropriate external agencies, the City Operational Prevent Lead/DSL takes the view that there is a material risk to the member of staff, then the member of staff will be referred to the City Channel Referral Panel which will consist of the City Prevent Lead, the Operational Prevent Lead, Director of Human Resources and two other members appointed by the President.

4.6 The member of staff will be informed that they have been referred to the Panel and the Panel's decision and reasons supporting that decision.

4.7 The City Operational Prevent Lead will only make a formal referral to Channel on the Panel's recommendation.

## 5 REPORTING CONCERNS – GENERAL

5.1 City's primary Prevent duty of care is to students, but the Act refers to people at risk of radicalisation generally. In the event that a member of staff is concerned that any other individual associated with City is at risk of radicalisation, then the process and procedures set out Clause 3 and 4 of this Annex should be followed, but the report should be made in the first instance to the relevant Dean or Professional Services Director depending on the individual's relationship with City.

## 6 CONFIDENTIALITY

6.1 City provides a number of support services to staff and students which offer a secure environment for individuals to discuss sensitive issues in confidence. City is committed to a strict Confidentiality policy when delivering these services.

6.2 However, there are exemptions to this commitment to confidentiality which may result in the disclosure of specific information about an individual or a group of individuals engaged in unlawful activity to bodies either within or outside City including the relevant HE/FE Prevent Coordinator, Channel, the police and social services.

6.3 Information disclosed in relation to Prevent Safeguarding cases must be shared strictly on a case by case 'need to know' basis, taking into account necessity, proportionality and wherever possible consent and must remain strictly confidential within the group of staff relevant to the case.

**Annex H**

**Contact details**

| Internal Contacts | | |
| --- | --- | --- |
| **Title** | **Name** | **E-Mail** |
| Designated Safeguarding Leads (DSL) | Louise Jennings<br><br>Leah Marsland | Safeguarding@city.ac.uk |
| HR Designated Safeguarding Officer (allegations against a staff member) | Bunmi Odulaja | Bunmi.Odulaja@city.ac.uk |
| Deputy Director of HR | Mark Gardner | Mark.Gardner@city.ac.uk |
| Security Desk | Doug Thomson<br>Steve Porthouse | Security@city.ac.uk |

| External Contacts | | |
| --- | --- | --- |
| **Title** | **Tel.** | **E-Mail** |
| Local Authority Designated Officer (LADO) | 020 7527 8102 | LADO@islington.gov.uk |
| Islington Children's Services Contact Team | 020 7527 7400 | |
| C & I Police Child Abuse Investigation Team | 020 8733 4286 | |
| Children's Social Care Out of hours (after 5pm and weekends) | 020 7226 0992 | |
| Islington Safeguarding Adults Access team | 020 7527 2299 | access.Service@islington.gov.uk. |
| Forced Marriage Unit | 020 7008 0151 | www.gov.uk/stop-forced-marriage |
| Karma Nirvana Honour Network Helpline | 0800 5999 247 | infor@karmanirvana.org.uk |
| NSPCC | 0800 800 500 | help@nspcc.org.uk |
| Childline | 0800 1111 | |

**Annex I**



# Safeguarding Guidance for Working Remotely

This document provides guidance for online teaching/staff working remotely as part of the Universities hybrid working arrangements.

Whilst there is great potential to support students and their learning via digital resources, if used inappropriately our students and staff could be put at risk. The aim of this document is to identify best safeguarding practice and provide a helpful resource to support staff at City in supporting students online during institutional closure.

## General guidance for all staff

- Ensure you are familiar with City's Safeguarding Policy.
- Continue to look out for signs that a student may be at risk.
- Use appropriate language in your communications with students
- Ensure personal data of students and staff is only available to the people who need to see it.
- Only use City's approved platforms. These are Moodle, Zoom and MS Teams.
- If you are using video technology when working with students make sure that you are dressed appropriately and ensure that backgrounds do not contain anything personal or inappropriate.
- Only use your organisational email address to communicate with students. Never use your personal account or social media for teaching, assessment and support discussions.
- Phone calls, if absolutely necessary, should be made with the caller ID hidden so personal contact details are not visible or via MS Teams call function.

## Guidance for academic staff

- Set clear expectations around setting academic work and when you are available to give feedback.
- Set your computer to 'Do Not Disturb' if you are delivering live content.

- Ensure that you can restrict access to the session.
- Do not invite any other contacts into the session.
- Where possible run live classes at the scheduled time.
- Students should have prepared a suitable space for the session and be ready to start on time.
- Make sure that students know that the session is live and that any comments they make will be seen by others.
- Content must not be shared over social media.
- Lessons should be in appropriate areas and ensure that backgrounds do not contain anything personal or inappropriate.
- Lecturers and students must wear appropriate clothing,
- Keep registers and times of the sessions up to date

## In a 1-1 setting

- Ensure that you are able to work in an area which ensures the student's privacy if you are working in a 1-1 capacity.
- If you are in a clinical/support 1-1 setting, ensure, where possible, that you know the location of the student when the online appointment takes place to enable a prompt response should there be a safety issue i.e., room number, address and phone number.
- Re-iterate boundaries as working from home brings you into each other's personal space.
- Be open and ask your student if they are finding it difficult/easy - and negotiate a new way of working if needed.
- Screen sharing can be beneficial so you can work on the same documents together in a session. However, there may be compatibility and digital literacy issues.
- Keep your own routine and boundaries by only agreeing times you are comfortable with (i.e. your normal working hours)

**Annex J**

**Glossary of terms**

For the purposes of this Policy and Process document, the following definitions shall have the meaning as follows:

**Abuse -** Types of abuse, see below, as defined by Social care institute for excellence (scie) - At a glance 69: Safeguarding adults:

a) Physical abuse
b) Domestic violence and abuse
c) Sexual abuse
d) Psychological or emotional abuse
e) Financial or material abuse
f) Modern Slavery
g) Discriminatory abuse
h) Organisational or institutional abuse
i) Neglect and acts of omission
j) Self-neglect

**Adult at Risk** (Care Act 2014 changed terminology, was previously referred to as Vulnerable Adult**)** The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable adult as a person who is 18 years or over and who:

- is living in residential accommodation, such as a care home or a residential special school
- is living in sheltered housing
- is under the supervision of the probation services
- Is receiving a service or participating in an activity for people who have particular needs because of their age or who have any form of disability
- is receiving direct payments from a local authority or health and social care trust in lieu of social care services
- lacks capacity as defined in the Mental Capacity Act 2005


**Child or Young Person -** Child or Young Person applies to a person under 18 years of age as defined in the Children Act 2004.

Safeguarding and protecting the welfare of children is defined as:

- Preventing impairment of a child's health or development
- Protecting children and young persons from maltreatment
- Ensuring children and young persons can grow up in a safe, effective environment
- Taking action to enable all children and young persons have the best life chances.

**Principal Designated Safeguarding Officer (PDSO)** is undertaken
by the Chief Operating Officer with overall responsibility for Safeguarding and Prevent at City and is responsible for ensuring legal and regulatory compliance and for ensuring this Policy is implemented.

**Designated Safeguarding Lead (DSL)**
The member of staff named in Annex H with overall operational responsibility for Safeguarding and Prevent at City and is responsible for ensuring legal and regulatory compliance and for ensuring this Policy is implemented.

**Designated Safeguarding Officers (DSO)**
The members of staff named in Annex H with local safeguarding responsibilities in the relevant School or Professional Services Directorate and take the lead in responding to safeguarding and Prevent concerns.

**Prevent Duty**
Prevent Duty means the legal duty placed on City by the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

**Development**
Physical, intellectual, emotional, social or behavioural development.

**Health**
Physical or mental health.

**Ill-treatment**
Includes sexual abuse and forms of ill-treatment which are not physical.

**Significant harm**

Significant harm refers to the threshold that justifies referral to the appropriate external agencies. Relevant factors in deciding whether harm is significant include: the severity of ill-treatment, the degree and extent of harm and the duration and frequency of abuse and neglect.

**Annex K**

**Safeguarding adults: Types and indicators of abuse** definitions

SCIE

## Physical abuse

**Types of physical abuse:**

• 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, restricting movement (e.g., tying someone to a chair).

**Possible indicators of physical abuse:**

• No explanation for injuries or inconsistency with the account of what happened
• Injuries are inconsistent with the person's lifestyle
• Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
• Frequent injuries
• Unexplained falls
• Subdued or changed behaviour in the presence of a particular person
• Signs of malnutrition
• Failure to seek medical treatment or frequent changes of GP.

## Domestic violence or abuse

**Types of domestic violence or abuse** - Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

• psychological
• physical
• sexual
• financial
• emotional

Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have

been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour'-based violence, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence.

Coercive behaviour can include:

• Acts of assault, threats, humiliation and intimidation
• Harming, punishing, or frightening the person
• Isolating the person from sources of support
• Exploitation of resources or money
• Preventing the person from escaping abuse
• Regulating everyday behaviour.

**Possible indicators of domestic violence or abuse:**

• Low self-esteem
• Feeling that the abuse is their fault when it is not
• Physical evidence of violence such as bruising, cuts, broken bones
• Verbal abuse and humiliation in front of others
• Fear of outside intervention
• Damage to home or property
• Isolation – not seeing family or friends
• limited access to money

## Sexual abuse

**Types of sexual abuse:**

• Rape, attempted rape or sexual assault
• Inappropriate touch anywhere
• Non-consensual masturbation of either or both persons
• Non-consensual sexual penetration or attempted penetration of the vagina, anus or mouth
• Any sexual activity that the person lacks the capacity to consent to
• Inappropriate looking, sexual teasing or innuendo or sexual harassment
• Sexual photography or forced use of pornography or witnessing of sexual acts
• Indecent exposure.

**Possible indicators of sexual abuse:**

• Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
• Torn, stained or bloody underclothing
• Bleeding, pain or itching in the genital area
• Unusual difficulty in walking or sitting
• Foreign bodies in genital or rectal openings
• Infections, unexplained genital discharge, or sexually transmitted diseases
• Pregnancy in a woman who is unable to consent to sexual intercourse
• The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
• Incontinence not related to any medical diagnosis
• Self-harming
• Poor concentration, withdrawal, sleep disturbance
• Excessive fear/apprehension of, or withdrawal from, relationships
• Fear of receiving help with personal care
• Reluctance to be alone with a particular person.

## Psychological or emotional abuse

### Types of psychological or emotional abuse:

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally 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 stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying.

### Possible indicators of psychological or emotional abuse:

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment.

## Financial or material abuse

### Types of financial or material abuse:

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- 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.

### Possible indicators of financial or material abuse:

- Missing personal possessions

• Unexplained lack of money or inability to maintain lifestyle
• Unexplained withdrawal of funds from accounts power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
• Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
• The person allocated to manage financial affairs is evasive or uncooperative
• The family or others show unusual interest in the assets of the person
• Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
• Recent changes in deeds or title to property
• Rent arrears and eviction notices
• A lack of clear financial accounts held by a care home or service
• Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
• Disparity between the person's living conditions and their financial resources e.g., insufficient food in the house
• Unnecessary property repairs.

## Modern slavery

### Types of modern slavery:

• Human trafficking
• Forced labour
• Domestic servitude
• Sexual exploitation, such as escort work, prostitution and pornography
• Debt bondage – being forced to work to pay off debts that realistically they never will be able to.

### Possible indicators of modern slavery:

• Signs of physical or emotional abuse
• Appearing to be malnourished, unkempt or withdrawn
• Isolation from the community, seeming under the control or influence of others
• Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
• Lack of personal effects or identification documents
• Always wearing the same clothes
• Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
• Fear of law enforcers.

Further Home Office information on identifying and reporting modern slavery - https://modernslavery.co.uk/

## Discriminatory abuse

### Types of discriminatory abuse:

• Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010 - www.equalityhumanrights.com/privateand-public-sector-guidance/guidance-all/protected-characteristics)
• Verbal abuse, derogatory remarks or inappropriate use of language related to a protected

characteristic
• 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.

**Possible indicators of discriminatory abuse:**

• The person appears withdrawn and isolated
• Expressions of anger, frustration, fear or anxiety
• The support on offer does not take account of the person's individual needs in terms of a protected characteristic.

## Organisational or institutional abuse

**Types of organisational or institutional abuse:**

• 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
• 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.

**Possible indicators of organisational or institutional abuse:**

• Lack of flexibility and choice for people using the service
• Inadequate staffing levels
• People being hungry or dehydrated
• Poor standards of care
• Lack of personal clothing and possessions and communal use of personal items
• Lack of adequate procedures
• Poor record-keeping and missing documents
• Absence of visitors
• Few social, recreational and educational activities
• Public discussion of personal matters
• Unnecessary exposure during bathing or using the toilet
• Absence of individual care plans
• Lack of management overview and support.

## Neglect and acts of omission

**Types of neglect and acts of omission:**

• Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
• Providing care in a way that the person dislikes
• Failure to administer medication as prescribed
• Refusal of access to visitors
• Not taking account of individuals' cultural, religious or ethnic needs
• Not taking account of educational, social and recreational needs
• Ignoring or isolating the person
• Preventing the person from making their own decisions
• Preventing access to glasses, hearing aids, dentures, etc.
• Failure to ensure privacy and dignity.

**Possible indicators of neglect and acts of omission:**

• Poor environment – dirty or unhygienic
• Poor physical condition and/or personal hygiene
• Pressure sores or ulcers
• Malnutrition or unexplained weight loss
• Untreated injuries and medical problems
• Inconsistent or reluctant contact with medical and social care organisations
• Accumulation of untaken medication
• Uncharacteristic failure to engage in social interaction
• Inappropriate or inadequate clothing.

**Self-neglect**

**Types of self-neglect:**

• Lack of self-care to an extent that it threatens personal health and safety
• 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.

**Indicators of self-neglect:**

• Very poor personal hygiene
• Unkempt appearance
• Lack of essential food, clothing or shelter
• Malnutrition and/ or dehydration
• Living in squalid or unsanitary conditions
• Neglecting household maintenance
• Hoarding
• Collecting a large number of animals in inappropriate conditions
• Non-compliance with health or care services
• Inability or unwillingness to take medication or treat illness or injury.