

My Life Learning

Safeguarding Children & Vulnerable Adults Policy

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Uploaded to website	Yes

Key Contacts

Key Safeguarding Personnel: My Life Learning

Role	Name	Telephone	Email
Key Designated Safeguarding Lead (DSL)	Josh Hill	01257 472 900 (ext. 1060)	Joshua.hill@my-life.org.uk
Designated Safeguarding Leads	Caroline Lamb	01257 472 900 (ext. 1014)	caroline.lamb@my-life.org.uk
Safeguarding Liaison Officers for My Life* See note below	Caroline Tomlinson	01257 472 900 (ext.)	caroline.tomlinson@my-life.org.uk
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CEO of My Life	Caroline Tomlinson	01257 472 900 (ext. 1016)	caroline.tomlinson@my-life.org.uk

***Some MLL Learners attend My Life provision on Thursday or Friday**

Agency Contact Details

Designated Officer	Diane Kitcher	01942 486042	lado@wigan.gov.uk
Children's Social Care Referrals	Duty Team	01942 828 300	Professional referrals - for children (wigan.gov.uk)
Wigan Safeguarding Children Board	Duty officer	01942 486 025	wscb@wigan.gov.uk
Wigan Safeguarding Adults Board	Duty officer	01942 486 025	wsab@wigan.gov.uk
NSPCC Advice line	help@nspcc.org.uk	0808 800 5000	https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

If you believe a child or adult is at immediate risk of significant harm, injury, or death, contact the Police on 999.

1.0: Statement of Policy

1.1 Introduction

Purpose of the Policy:

This policy sets out My Life Learning's commitment to keeping children and adult learners with special educational needs and/or disabilities safe from abuse, neglect, and exploitation. The policy provides guidance about procedures, roles, responsibilities and reporting your concerns.

Equality and diversity: My Life Learning is committed to promoting equality, good relations and to challenging discrimination. Our ethos is to embrace diversity, offer equality of opportunity, and to treat every individual fairly and with respect. The safeguarding policy should be applied in accordance with this ethos.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment

- preventing impairment of children’s health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes (HM Government, 2015).

Safeguarding adults is defined as:

- protecting an adult’s right to live in safety, free from abuse and neglect.
It involves:
- people and organisations working together to prevent and stop both the risks and experience of abuse and neglect, while at the same time ensuring that the adult’s wellbeing is supported including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding action

The legal definition of an ‘adult at risk’ is anyone aged 18 or over who:

- has needs for care and support (whether the local authority is meeting any of those needs) and
- is experiencing, or is at risk of abuse or neglect; and
- because of those care and support needs is unable to protect themselves from either the risk, or the experience of abuse or neglect.

This policy has been developed in accordance with the principles established by:

- The Care Act 2014
- The Children and Social Work Act 2017
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2021
- The Mental Health Act 1983 (amended 2007)
- The Human Rights Act 1998
- Safeguarding Children and Safer Recruitment in Education DFE 2012

This policy references other key documents including:

- GDPR and Data Protection Act 2018
- Information Sharing: Advice for Practitioners 2018
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2018
- Coronavirus (COVID-19) Safeguarding in Schools, Colleges and Other Providers 2020
- Counter-Terrorism and Security Act 2015
- Prevent Duty Guidance 2015
- Serious Crime Act 2015
- Wigan Safeguarding Children Board Policy and procedures;
<https://www.wiganlscb.com/Professionals/Guidance-and-policies/index.aspx>

- Wigan Safeguarding Adults Board Policy and procedures for the protection of vulnerable adults in Wigan. <https://www.wigansafeguardingadults.org/The-Board/Index.aspx>

1.2 Aim of the Policy

The aim of this policy is to ensure that:

- all our learners are safe and protected from harm
- effective safeguarding procedures are in place to help learners to feel safe and learn to stay safe
- all staff in the education setting receive regular training so that they are aware of the signs of abuse and understand their legal responsibilities in relation to safeguarding and child protection

This will be achieved by:

- supporting each learner's development in ways that promote security, confidence, and independence
- providing a high quality and safe environment in which children and adults feel safe, secure, valued, and respected
- raising staff awareness of the need to safeguard children and adults. Emphasising their responsibilities in identifying and reporting possible cases of abuse and preventing and intervening earlier to address the support and social needs of the individual
- providing a systematic means of monitoring children and adults known or thought to be at risk of harm and ensure My Life Learning contributes to the assessment of need
- emphasising the need for good levels of communication between managers and all staff
- developing a structured procedure which will be followed by all staff in cases of suspected abuse
- ensuring that all staff have access to specific training and awareness including staff behaviour policy, DSL training, KCSIE Part 1, online safety, Prevent and whistleblowing
- developing and promoting effective multi-agency cooperation and communication with external agencies including, health, social care, and the Police
- ensuring that all staff working within My Life Learning who have access to children and young people have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check and a central record kept for audit
- providing a My Life Learning curriculum that promotes learners' awareness about safeguarding and keeping safe.

1.3 This policy should be read in conjunction with the following policies

- Equality and Diversity Policy
- Anti-Bullying Policy

- Whistle Blowing Policy
- Code of Conduct Policy
- Data Protection (GDPR) Policy
- Spot Checks Policy
- Behaviour Policy
- Anti-Radicalisation and Extremism Policy
- Complaints and Concerns Policy
- Notification: Charity Commission Reporting Serious Incidents Policy
- Prevent Policy
- Professional Behaviour Policy
- Disciplinary Policy

1.4 Scope

This policy applies to all members of staff at My Life Learning.

2.0 Roles and Responsibilities

Safeguarding and promoting the welfare of adults and children is everyone's responsibility. All employees at My Life Learning have a role to play in safeguarding learners and we need to make safeguarding personal. This means that it should be person-led and outcome-focused. All staff undergo safeguarding training at induction, relevant update training is provided for teachers and DSL's. Teachers and LSAs will engage in regular safeguarding review meetings.

2.1 Designated Safeguarding Leads

My Life Learning (MLL) has three appointed DSL's to act as a point of contact in all safeguarding matters across all aspects of the MLL provision.

Lead DSL's for My Life Learning: **Caroline Lamb/Joshua Hill**

DDSL for My Life Learning : **Joanna McMurchie**

Safeguarding governor: **Alison Albion**

Currently there is one Safeguarding Officer: Scott Cummins, in addition to two DSL's, who have oversight of any learners who engage in the wider My Life activities on other days of the week. Liaison between the safeguarding officer, DSL's and My Life Learning's DSLs is key to ensuring safeguarding issues are communicated well and managed effectively.

The My Life Learning's DSL's and DDSL's are most likely to have the complete picture and be the most appropriate person to advise on responses to safeguarding concerns. The DSL's take lead responsibility for safeguarding and ensure that My Life Learning's Safeguarding policy is fully implemented. All DSL's and DDSL's will be trained to a minimum of Safeguarding Level 3, and this will be updated every two years as a minimum. The DSL's will also attend multi-agency courses as available and appropriate to the needs of the College.

In My Life Learning, during term time, the DSL's/DDSL are always available for staff to discuss any safeguarding concerns. At least one DSL will meet with learner group tutors and LSA's on a four-weekly basis to discuss safeguarding issues and ongoing concerns. Notes of these meetings will be maintained, and any concerns registered on CPOMS. The learner voice is central to our safeguarding practice and learners will be encouraged to express opinion and have their views heard.

The DSL's have responsibility for the day-to-day operational implementation of safeguarding practice. This includes:

- providing advice, support, and expertise to all staff on safeguarding matters
- managing, when required, the referral of cases of suspected abuse or allegations to the relevant agencies
- liaising with other DSLs in health and education settings
- maintaining detailed, accurate and secure written records of concerns, allegations, and referrals
- referring cases to the Channel programme where there is a radicalisation concern
- attending case conferences and review meetings as appropriate
- communicating this policy and the safeguarding arrangements to all relevant parties, including families and carers
- ensuring that all staff receive regular safeguarding training appropriate to their roles.

The My Life Learning Designated Safeguarding Leads and Deputy will:

- Ensure all staff and members of the Local Governing Committee are aware of, and familiar with, this policy and related documentation.
- Support staff, where necessary, in reporting incidents and concerns, including low level concerns.
- Ensure all members of the Safeguarding Team, staff and governors are up to date in terms of training.
- Ensure all staff receive regular update training on current safeguarding issues such as peer-on-peer abuse, bullying and female genital mutilation.
- Ensure all staff are aware of how to identify and respond to risks to learners from extreme radical views.
- Embed safeguarding across the college to ensure all staff are fully aware of environmental and social factors that may impact on learners' welfare.
- Generate timely, accurate safeguarding reports.
- Generate timely accident and incident reports.
- Work with the police where necessary, to enable investigation of allegations of criminal abuse against children's and adults.
- Attend as appropriate Local Authority Designated Person Support Network meetings.
- Work with the Chair of the Local Governing Committee, the Safeguarding governor, DSL's across the organisation and the CEO to ensure the Safeguarding provision is a sound and secure offer.

The Local Governing Committee has a duty to ensure that My Life Learning meets its statutory safeguarding responsibilities and that all learners supported by My Life Learning are safe. The DSL's provide quarterly reports to the Local Governing Committee to support their execution of this function. The Chair of Governors is responsible for reporting safeguarding concerns to the CEO and Trustee Board.

The Chief Executive Officer will take the lead responsibility for any safeguarding concerns raised.

2.2 Staff Responsibilities

All staff working at My Life Learning have a duty to promote the welfare and safety of our learners. Staff may receive disclosures of abuse, observe, or have suspicions of abuse. Any such concerns (whether witnessed or otherwise) should be reported immediately to a DSL, DDSL or the most senior member of staff on duty in their absence.

All staff **must**:

- maintain an attitude of 'it could happen here' in order to remain vigilant to the possibility of abuse and ensure that any and all safeguarding concerns, including low level concerns, are reported and acted on in the appropriate manner.
- maintain professional relationships with learners **at all times**. No attempt should be made to build or encourage friendships with learners or their families outside of work. This includes telephone and personal contact details and linking through social media.
- ensure all correspondence with learners and their families is via My Life Learning/My Life Legacy systems.
- familiarise themselves with the safeguarding and other related policies and ensure they understand and adhere to these policies
- report all concerns, without judgement about their significance, to the Designated Safeguarding Lead
- maintain confidentiality at all times, in accordance with the policy and associated procedure
- ensure their training is regularly updated, in line with the College's and Charity's expectations, including safeguarding that includes the Prevent duty
- actively uphold the expected values of respect, tolerance, compassion and integrity, modelling these values through their behaviour.
- be alert to signs and indicators of possible abuse
- be able to record and report concerns
- be able to deal with a disclosure of abuse from a learner.

Staff should not assume a colleague or other professional will act and share information that might be critical in keeping a person safe. It is their duty to report. Early information sharing is vital for risk identification and management.

All staff **must** complete their safeguarding induction training before working with any learners. All staff will have safeguarding training which will be updated every three years as a minimum to ensure staff understand their role in safeguarding. All staff will receive regular updates on safeguarding via email, e-bulletins, termly newsletters and staff meetings. All staff are required to complete additional Safeguarding Level 2 training via E-Learning and any other training as required by the College management.

My Life Learning staff **must** read and understand Part 1 of Keeping Children Safe in Education and any future updates. **They must sign that they have read it.**

All staff **are required to** demonstrate good knowledge of the categories of abuse and associated risk indicators.

All staff **must** undertake Prevent training.

2.3 Responding to Concerns, Allegations and Disclosures of Abuse

It is a requirement that all staff **must** familiarise themselves with The Four R's:

- Recognise
- Respond
- Record
- Refer

The first step is to **recognise** the signs of abuse, so staff **must** familiarise themselves with the areas covered in Appendix 1 of this policy. If potential abuse, harm, or neglect is recognised, staff **must respond** and report the concerns to the DSL immediately or the most senior member of staff in their absence.

All staff **must record** their findings in detail via the relevant recording procedures (CPOMS). Staff **must** ensure that the DSL receives the record as soon as possible.

If there is an immediate risk of harm to the child or adult, you **must refer** the incident to the Local Authority or the police if a criminal act is suspected.

Staff **must** adhere to the following 'Do's and 'Don'ts when responding to a disclosure of abuse.

Do:

- create a safe environment by offering the individual a private and safe place to talk
- stay calm and reassure the person and reiterate that he/she is not to blame
- listen carefully while the individual tells you the facts. Do not interrupt their story or add your views. Then tell the person what you are going to do next
- explain that you need to report the safeguarding concerns
- record in detail without delay the facts that the learner has told you.

Don't:

- take photographs of any injuries
- postpone or delay the opportunity for the person to talk
- investigate the allegation yourself
- promise confidentiality
- discuss/disclose it with any colleagues
- approach or inform the alleged abuser.

2.4: Risk assessments

A range of risk assessments are in place in My Life Learning. All risk assessments are kept under review and modified as required based on learners' needs and adaptations. Risk assessments are developed for each classroom and learner and include a COVID section. Risk assessments are in place for all areas and activities on site. They are held centrally online and therefore accessible to all staff who need to be aware of their content. Orange zone risk assessments are in place and out-of-zone risk assessments are produced for when learners are accessing other areas of the site. The aim is to ensure that the balance of risk against achieving progression remains central to the work of the College.

3.0: Information Sharing

My Life Learning recognises that all information related to safeguarding concerns and child protection must be confidential and stored securely.

Information sharing is vital for risk formulation and management and is integral for safeguarding and promoting the welfare of children and adults at risk.

Any decisions to share information should be in line with the Data Protection Act 2018 and GDPR, however these are not barriers to sharing information.

All staff have a professional responsibility to share information as a means to safeguard members. Any queries regarding the sharing of confidential information should be discussed with the Caldicott Guardian.

My Life Learning is committed to working in partnership with families and carers. However, the DSL's will not share information where there are concerns and if doing so would:

- place the individual at increased risk of significant harm
- prejudice the prevention, detection, or prosecution of serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm

3.1: Information Sharing for Safeguarding Practitioners

The UK Government have issued 'Golden Rules' for information sharing in safeguarding:

- GDPR/Data Protection Act 2018 and Human Rights Act 1998 are not barriers but provide a framework to ensure that personal information is shared appropriately

- be open and honest with the individual
- seek advice from other practitioners if you are in any doubt about sharing the information
- share with informed consent where appropriate
- consider safety and wellbeing
- necessary, proportionate, relevant, adequate, accurate, timely and secure
- keep a record of your decision and the reasons for it

All sharing of information will be necessary to the purpose for which it is shared. Information will only be shared with individuals who need to have it and shared via secure channels.

3.2: CPOMS

CPOMS is My Life Learning's chosen software solution for monitoring safeguarding across the organisation. CPOMS is a secure, web-based solution that allows staff to feel confident in the knowledge that the information they report is shared instantly with the relevant people, immediately and securely. All staff have had training in logging on to CPOMS and create information on any learner they have concerns about. They cannot, however, access learner information without the required permissions (managed by the DSL's).

The DSL's can swiftly assess the information and take necessary action as required.

4.0: Monitoring and Evaluation

My Life Learning's safeguarding policy and procedures will be monitored regularly and updated by:

- DSL four-weekly meetings with staff groups for different classes
- SMT drop-ins and discussions with learners and staff
- learner surveys or adapted feedback methods to meet individual needs
- scrutiny of exclusion and attendance data
- records of bullying, racist, behaviour incidents and the monitoring process
- review of parental concerns and parent/carer questionnaires need to do
- review of the use of intervention strategies
- feedback from Statutory Body visits (Ofsted, CQC)

5.0: Safer Recruitment

My Life Learning's commitment to safer recruitment includes:

- carefully planning the recruitment process timeline to ensure we have enough time to thoroughly vet each candidate
- provide detail on job adverts outlining all the checks we will carry out on candidates
- interviewers will meet to agree questions to be asked in the interview, to ensure everyone knows what they are looking for and to agree a notetaker
- informing candidates of our commitment to safeguarding children and adult learners

- at least one person on every recruitment panel will have completed Safer Recruitment Training which is renewed every three years as a minimum
- carry out pre-employment checks including DBS, qualification checks, reference checks and identity checks
- ensure staff members are appropriately trained to fulfil their duties

6.0: Local Governing Committee Responsibilities

My Life Learning's Health & Safety policy reflects the consideration we give to the protection of children and adult learners within the My Life Learning environment, including in relation to internet safety, and when away from the College site undertaking off-site trips and visits.

Site security guidance has been compiled to support the senior management of the College in discharging their responsibilities by ensuring the development and implementation of suitable procedures. Significantly, in maintaining the security of the premises in response to potential threats to staff and learners.

The Local Governing Committee, in conjunction with the Board of Trustees take the responsibility outlined under Section 175 of the Education Act 2002 to safeguard and promote the welfare of children and vulnerable adults very seriously. In addition, by working together with other agencies, ensure adequate arrangements are in place to identify, assess, and support children and vulnerable adults who are at risk of suffering abuse and neglect.

The Local Governing Committee ensures that My Life Learning policies and procedures are reviewed and in-line with national and local safeguarding requirements. They work with College leaders to make sure the key actions set out in Safe Setting are in place. These include that:

- a safeguarding, child protection and early help policy are in place together with a staff behaviour (code of conduct) policy
- the education setting operates a safer recruitment procedure by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment Training
- a senior leader has DSL responsibility
- on appointment, the DSL undertakes inter-agency training and undertakes DSL "new to the role" training and an update course every two years
- all other staff have access to safeguarding training as appropriate
- any weaknesses in Child Protection processes and procedures are remedied immediately
- a nominated member of the Local Governing Committee/Trustees is identified to liaise with the Local Authority on safeguarding issues and in the event of an allegation of abuse made against the Head of College
- safeguarding, Child Protection and Early Help (Thresholds of Needs) policies are available on My Life's website or by other means

- the Local Governing Committee promotes the development of a curriculum to ensure students learn about safeguarding and staying safe. Online safety is part of the existing curriculum requirements.

7.0 Allegations Against Staff

There are clear procedures in place for the management of allegations of abuse against staff and volunteers. If an allegation is made or information is received that suggests that a person may be unsuitable to work with vulnerable children or adults, the CEO and DSL must be informed immediately. The DSL will discuss the content of the allegation with the Designated Officer (formally LADO).

All staff are expected to have awareness and knowledge of the guidance on behaviour issues, along with My Life Learning's Behaviour Management Policy and this should be part of induction for all new staff or volunteers.

Under no circumstances will My Life Learning send a learner home pending such an investigation, unless this advice is given exceptionally, because of a consultation with the DO.

Suspension of a member of staff will be given careful consideration and the DSL will seek advice from HR to decide and will inform the DO at the earliest opportunity.

In the event of an allegation against the DSL, the CEO will take lead responsibility. Within My Life Learning, in the event of an allegation against the Head of College, the decision to suspend will be made by the Chair of Governors and the CEO.

A referral will be made to the DBS and PiPOT if a person working with vulnerable children or adult has been dismissed or removed from post due to safeguarding concerns. Referrals should be made as soon as possible, and usually on conclusion of an investigation. This could include when an individual is suspended, redeployed into work that is not regulated activity, dismissed, or resigned. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation. Employers should ensure they have sufficient information to meet the referral duty criteria explained within the DBS referral guidance.

Guidance about conduct and safe practice, including safe use of mobile phones, will be provided at induction alongside further safeguarding information.

8.0: Children and vulnerable adults with special educational needs and/or disabilities (SEND)

My Life Learning will use the same considerations for learners, all of whom have SEND. College managers recognise that careful consideration needs to be taken in relation to the additional barriers that can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of abuse such as behaviour, mood change, and injury relate to the individuals SEN or disability without further investigation
- high risk of vulnerability due to factors such as learning disability, lack of

awareness, social isolation, all of which may contribute to risks such as online vulnerability

- being more prone to peer group isolation
- the potential for individuals with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these.

Individuals with SEN and disabilities can face several challenges to disclosure, which must be recognised and considered, including prejudice, negative responses, and low expectation.

9.0: Children and Vulnerable Adults Missing from Education (CME)

My Life Learning have all learners documented on the admission register at the beginning of the day. If the learner fails to attend on the agreed date, My Life Learning should undertake reasonable enquiries to establish the learner's whereabouts and consider notifying the local authority at the earliest opportunity.

My Life Learning have a duty in respect of their learners and as part of this should investigate any unexplained absences.

All staff must report immediately to the DSL if they know any learner who may be:

- missing – whereabouts unknown and unable to make contact (because of making reasonable enquiries)
- missing education

10.0: Physical Intervention and the use of reasonable force

Staff **must** only use physical intervention as a last resort when a child or adult learner is endangering themselves or others.

The term 'reasonable force' covers a broad range of actions that involve a degree of physical contact to control or restrain individuals. Any use of force must be reasonable, proportionate, and necessary to the risk posed at that time.

All staff who may need to use physical intervention or reasonable force are adequately trained in Team Teach, an accredited training regime for positive behavioural management.

All events involving physical intervention should be recorded in detail. Any physical intervention of a nature which causes injury or distress may be considered under child protection or disciplinary procedures.

My Life Learning recognises that touch may be appropriate in the context of working with children and adults, and all staff **must be aware of the practice guidance** related to clear professional boundaries.

11.0: Training and induction

11.1: Training:

My Life Learning has a Training & Development Team of which the DSLs are a part. The aim is to deliver training sessions on specific areas of safeguarding and child and adult protection grounded in expectations of high standards of behaviour within and outside the organisation. All staff and learners are expected to embrace these expectations to ensure safe procedures and the safety of learners, staff and visitors..

11.2: Induction

The welfare of our learners is of paramount importance. All new staff take part in the induction process which includes introduction to the safeguarding policy and procedures including online safety. All new staff are required to undergo face-to-face safeguarding training with the DSL.

11.3: Safeguarding Training

All staff participate in safeguarding training which is updated every three years as a minimum to ensure their understanding and knowledge of current safeguarding issues. In addition, they receive statutory training and safeguarding updates via alternate means (email, newsletter, staff meetings). They are required to complete e-Learning training as well as Prevent.

11.4: Advanced Training

The DSL/DDSL undergo additional training which is to be updated every two years as a minimum. The DSL/DDSL's also attend multi-agency courses relevant to the organisation's needs.

11.5: Preventing Radicalisation

All staff undertake mandatory Prevent training as well as additional workshops delivered by a DSL.

11.6: Governors' Induction and Training

Governor can undertake the My Life Learning induction programme as well as participating in induction briefings provided by the Chair. They may also choose to complete face-to-face training provided by Wigan Council.

12.0: Staff Support

My Life Learning supports staff by providing an opportunity to talk through challenging aspects of their role with a senior leader and seek further support as appropriate.

13.0: Whistleblowing Policy

All staff have a duty to ensure standards of quality care by raising concerns regarding wrongdoing or malpractice. Staff can confidentially raise genuine concerns of malpractice and/or misconduct through appropriate means at the earliest point without fear of reprisal.

This is intended to provide a safeguard to enable staff to raise concerns about one or more of the following that has occurred, is occurring, or is likely to occur. These qualifying disclosures mean that you can raise a concern about risk, malpractice or wrongdoing that is potentially harming the learners and undermining the services that My Life Learning delivers. Examples of these include, but are not limited to:

- unsafe care
- unsafe working conditions
- inadequate induction or training for staff
- lack of response to a Health & Safety incident
- suspicions of fraud
- damaging the environment such as disposing of hazardous materials or medication inappropriately
- a bullying culture
- incidents of unsafe staffing
- falsification of records
- failure to investigate claims of abuse
- breaching the Data Protection Act 2018

My Life Learning maintains a zero-tolerance policy for the ill-treatment of others, including bullying or harassment.

My Life Learning ensures that individuals who raise a concern can do so confidentially in line with the Public Interest Disclosure Act 1998 (PIDA).

My Life Learning will ensure that any individual who raises a genuine concern under the Whistleblowing Policy will not be at risk of termination of their employment or suffer any form of reprisal which includes, but not limited to, loss or reduction of hours to regular working patterns.

14.0: Definitions of abuse

The following are recognised as abuse as defined by the Care Act 2014, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021.

14.1 Definitions of Child Abuse

Physical Abuse

A form of abuse that may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. It may also include a parent or carer fabricating an illness or deliberately inducing an illness.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve overprotection and limitation of learning or preventing the child participating in normal social interaction.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of a child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing, and shelter. It may involve failing to protect a child from physical and emotional harm or preventing access to appropriate medical care or treatment.

Sexual Abuse

Forcing or enticing a child to take part in sexual activities. This may involve physical contact which includes assault by penetration (rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. Non-contact activities such as involving children in looking at or in the production of sexual images. Encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

14.2 Definitions of Adult Abuse

Physical Abuse

Includes assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.

Psychological Abuse

Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or Material Abuse

Including theft, fraud, exploitation, pressure in connection with property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Sexual Abuse

Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual acts to which the adult has not consented or was pressured into consenting.

Domestic Abuse

Including psychological, physical, sexual, financial abuse and so called 'Honour' Based Violence.

Neglect and Acts of Omission

Ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life such as medication, adequate nutrition, and heating.

Modern Slavery

Encompasses slavery, human trafficking, forced labour and domestic servitude, coercion, and deceit to force individuals into a life of abuse, servitude, and inhumane treatment.

Discriminatory Abuse

Including forms of harassment, slurs or similar treatment because of race, gender and gender identify, age, disability, sexual orientation, or religion.

Self-Neglect

Neglecting to care for one's personal hygiene, health or surroundings and includes behaviours such as hoarding.

Organisational Abuse

Incidents of poor practice or neglect that are based on the needs of staff/managers that causes significant harm to those subjected to it.

14.3 Other Definitions

Child Sexual Exploitation and Criminal Exploitation/County Lines

A form of abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, often in exchange for something the victim needs or wants. Child Sexual Exploitation and Criminal Exploitation can affect children and adults, both male and female, and can include individuals who are victims of trafficking for the purpose of exploitation as well as county lines.

Staff will ensure that the DSL and other key staff are trained in spotting the possible signs of exploitation.

Peer-on-Peer Abuse

Peer-on-Peer abuse is likely to include, but not limited to bullying (including cyberbullying), physical abuse (which includes threats or encouraging physical abuse), sexual violence, sexual harassment, up-skirting, youth produced sexual imagery, initiation/hazing type violence and rituals.

All Peer-on-Peer Abuse is taken seriously and not tolerated or passed off as “banter”. Victims, perpetrators and any other child or adult affected by Peer-on-Peer Abuse will be supported through My Life’s pastoral system and support will be regularly reviewed.

We minimise the risk of Peer-on-Peer Abuse for learners by providing a relevant curriculum that helps learners develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. My Life Learning have established systems in place for members to raise concerns with staff, knowing they will be listened to, supported, and valued, and that the issue they raise will be taken seriously.

Female Genital Mutilation (FGM)

A procedure where the female genitals are deliberately cut, injured, or changed with no medical reason or justification. Other terms include *sunna*, *gudniin*, *halalays*, *tahur*, *megrez* and *khitan*.

There are four types of FGM procedure:

- Clitoridectomy – partial/total removal of the clitoris
- Excision – partial/total removal of clitoris and labia minora
- Infibulation – entrance to the vagina is narrowed by repositioning the inner/outer labia
- All other procedures – pricking, piercing, incising, cauterising, and scraping the genital area

My Life Learning recognises and adheres to its mandatory duty to report any suspected or known cases of FGM about a female under 18 years old to the Police.

The DSL’s will maintain up-to-date knowledge of the Greater Manchester Safeguarding Partnership Protocol on FGM.

Forced Marriage

A human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. The Forced Marriage Unit offers support to victims and should be contacted for advice and support.

Serious Violence

Specific crimes such as homicide, knife crime and gun crime where serious violence or its threat is inherent. All staff should be aware of the indicators which may suggest a child, adult or learner is at risk from, or involved with serious violent crime.

Mental Health

Mental health problems can be an indicator that a person has suffered or is at risk of suffering abuse, neglect, or exploitation. Adverse experiences such as abuse, or trauma can have a long-lasting impact on a person’s childhood, adolescence, and adulthood.

Young Carers

A young carer is someone under 18 years-old who is responsible for looking after their family or friend who is ill or disabled. My Life recognises that being a young carer can impact learners and it's important these learners are identified early so that preventative strategies can be implemented to provide appropriate support.

The local Young Carers Strategy is coordinated by Wigan Safeguarding Children Board.

Radicalisation

Radicalisation is the process in which vulnerable individuals are coerced into supporting terrorism and various forms of extremist ideology. There is no specific way of identifying whether someone is vulnerable to extremist ideology, therefore all staff must remain vigilant when assessing changes in member's behaviour.

All staff are required to complete mandatory Prevent training and the DSL will remain as the senior point of contact.

Appendix One

Recognising Signs of Abuse

Please note that many of these signs also relate to abuse of vulnerable adults as well as children. Vulnerable adults and children with speech and communication disorders are at increased risk of abuse.

The following non-specific signs may indicate some form of abuse:

- significant changes in behaviour
- increased aggression or depressive state
- care-seeking behaviour
- suspicious bruising with unsatisfactory explanations
- lack of self-esteem and confidence
- self-injury
- inappropriate sexualised behaviour

The factors described in this section are frequently found in cases of abuse. Although their presence is not definitive proof that abuse has occurred, they:

- must be regarded as indicators of the possibility of significant harm
- justify the need for careful risk assessment and discussion with appropriate professionals
- may require consultation with Children's Services or Adult Social Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship, the child or vulnerable adult may appear frightened or act in a way that is inappropriate to their age and development or different to their typical behaviour.

Possible indicators of an abusive relationship with parents/carers include:

- persistently avoiding medical treatment
- having unrealistic expectations of the child/young adult
- frequently complain about/to the child/young adult
- fail to provide attention or praise to the child/young adult
- misusing substances
- refusing access to the home
- involvement in domestic abuse

Staff need to be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

The following indicators are often regarded as a physical abuse concern:

- unsatisfactory explanation of an injury
- several different explanations for an injury
- unexplained delay in seeking treatment
- parents/carers uninterested or undisturbed by an injury
- repeated presentation of minor injuries
- family use of different doctors and A&E departments
- reluctance to give information or mention previous injuries

Bruising

Children or vulnerable adults can have accidental bruising, but the following must be considered as a non-accidental unless there is sufficient evidence or adequate explanation provided:

- two simultaneous bruised eyes, without bruising to the forehead
- repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- variation in colour, possibly indicating injuries caused at different times
- the outline of an object used e.g., belt marks, handprints
- bruising or tears around or behind the earlobe, indicating pulling or twisting
- bruising around the face
- grasp marks on children or vulnerable adults
- bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

Medical opinion should be sought where there is any doubt over the origin of a bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds. They will always require experienced medical opinion. Any burn with a clear outline may be suspicious such as:

- circular burns from cigarettes
- linear burns from hot metal rods or electrical fire elements
- burns of uniform depth over a large area
- scalds that have a line indicating immersion or poured liquid
- old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scars to the buttocks of a child or vulnerable adult, particularly in the absence of burns to the feet, are indicative of dipping into hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- the history provided is vague, non-existent, or inconsistent with the fracture type
- there are associated old fractures
- medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- there is an unexplained fracture in the first year of life

Scars

Many scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- developmental delay or regression
- abnormal attachment between child/vulnerable adult and parent/carer e.g., anxious, indiscriminate or no attachment

- indiscriminate attachment or failure to attach
- aggressive behaviours towards others
- scapegoated within the family
- frozen watchfulness
- low self-esteem
- lack of confidence
- withdrawn
- difficulty relating to others

Recognising Sexual Abuse

Both males and females of all ages may be sexually abused, many of whom are scared to say anything due to guilt and/or fear. This is particularly difficult for a child or vulnerable adult to talk about, and a full account should be taken of the cultural sensitivities of any individual child/family. Children and young adults with communication difficulties are particularly vulnerable to abuse.

Recognition of sexual abuse can be difficult unless the child or vulnerable adult discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with sexual abuse are:

- inappropriate sexualised conduct
- sexually explicit behaviour, inappropriate to the child's age
- continual and inappropriate or excessive masturbation
- self-harm, self-mutilation, and suicidal ideation
- involvement in prostitution or indiscriminate choice of sexual partners
- an anxious unwillingness to remove clothes e.g., for sports events.

Some physical indicators associated with sexual abuse are:

- pain or itching of the genital area
- blood on underclothes
- pregnancy in a younger girl where the identity of the father is not disclosed
- physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen, and thighs
- sexually transmitted disease
- presence of semen on vagina, anus, external genitalia, or clothing

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young adults who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers, or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young adults as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or vulnerable adult. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry and physical damage. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or vulnerable adult has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some individuals, educative inputs may be enough to address the behaviour.

Abusive sexual activity, included any behaviour involving coercion, threats, aggression, together with secrecy, or where one participant relies on an unequal power base.

In order to fully determine the nature of the incident, the following factors should be given consideration. The presence of exploitation in terms of:

- **equality** – consider differentials of physical, cognitive, and emotional development, power, control and authority, passive, and assertive tendencies
- **consent** – agreement including all the following:
 - understanding that is proposed based on age, maturity, development level, functioning and experience
 - knowledge of society’s standards for what is being proposed
 - awareness of potential consequences and alternatives
 - assumption that agreements or disagreements will be respected equally
 - voluntary decision
 - mental competence
- **coercion** – the younger perpetrator who abuses may use techniques such as bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship etc. Some may use physical force, brutality or the threat of these regardless of victim resistance

When evaluating sexual behaviour of children and vulnerable adults, the above information should be used only as a guide.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- failure by parents or carers to meet the basic essential needs such as adequate food, clothes, warmth, hygiene, medical and dental care

- a child or vulnerable adult seen to be listless, apathetic, and irresponsive with no apparent medical cause
- failure of child to grow within normal expected pattern, or a child or vulnerable adult with unexplained weight loss
- child or vulnerable adult thrives away from home environment
- child or vulnerable adult frequently absent from school or college
- child left with adults who are intoxicated or violent
- child abandoned or left alone for excessive periods

Recognising Child Sexual Exploitation (CSE)

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation:

- underage sexual activity
- inappropriate sexualised behaviour
- repeated pregnancy, abortions, and miscarriages
- repeated sexually transmitted infections
- unexplained gifts from unknown sources
- new, unaffordable material items
- getting in/out of different vehicles with unknown adults
- contact with unknown perpetrators
- involved in abusive relationships
- intimidated and fearful of certain individuals
- truancy, exclusion, disengagement with services
- changes in behaviour (increased aggression, emotional distress, volatile behaviour)
- self-harm and suicidal ideation
- drug or alcohol misuse
- involvement in gangs
- injuries from physical assault, restraint, or sexual assault

Recognising Criminal Exploitation & County Lines

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children, young people and vulnerable adults who may be victims of criminal exploitation/county lines:

- staying out late or returning home late
- observed to be found in areas away from home
- increased drug use or being found with large amounts of drugs on their person
- secretive around who they are talking to and where they are going
- unexplained absences
- unexplained money, gifts, or material goods
- increasingly disruptive behaviour
- physical injuries and dishevelled appearance

Online Abuse

Online abuse is any type of abuse that happens on the internet. It can lead to anxiety, self-harm, eating disorders and suicidal thoughts. Online abuse can happen on:

- social media
- text messages and messaging apps
- emails
- online chats
- online gaming
- live-streaming sites

Individuals may experience different forms of online abuse including:

- cyberbullying
- emotional abuse
- grooming
- sexting
- sexual abuse
- sexual exploitation

An individual experiencing online abuse might:

- spend a lot more or a lot less time than usual online, texting, gaming, or using social media
- seem distant, upset, or angry after using the internet
- be secretive about who they're talking to and what they're doing online or on their devices
- have lots of new phone numbers, texts ,or email addresses on their devices

Female Genital Mutilation (FGM)

FGM is a human rights abuse and there are many circumstances and occurrences that may point to FGM happening such as:

- a learner talking about getting ready for a special ceremony
- family taking a long trip abroad
- a learner's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities such as Yemeni, Afghani, Kurdistan, and Pakistan)
- knowledge that the child's sibling has undergone FGM
- learner talks about going abroad to be 'cut' or to prepare for marriage

Many cultures believe that:

- FGM brings status/respect to the girl – social acceptance for marriage
- preserves a girl's virginity

- part of being a woman/rite of passage
- upholds family honour
- cleanses and purifies the girl
- gives a sense of belonging to the community
- fulfils a religious requirement
- perpetuates a custom/tradition
- helps girls be clean/hygienic
- is cosmetically desirable
- mistakenly think it makes childbirth easier

Signs that may indicate a child or young adult has undergone FGM include:

- prolonged absences from education and other activities
- behaviour change on return from holiday (withdrawn, appearing subdued)
- bladder or menstrual problems
- difficulty sitting still and appearing uncomfortable
- complaining about pain in the genital area
- mentioning something someone did to them but are not permitted to talk about it
- secretive behaviour, including social isolation
- reluctance to take part in physical activity
- repeated urinal tract infection

Similarly, to Forced Marriage, My Life Learning recognises the 'One Chance' rule and the need to act against FGM without delay.

Up skirting

Up skirting is now a criminal offence. It typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Serious Violence

All staff should be aware of indicators, which may signal that an individual is at risk from or are involved with serious violent crime. These may include:

- increased absences
- a change in friendships
- relationships with older individuals or groups
- a significant decline in educational performance
- signs of self-harm
- significant changes in wellbeing
- signs of assault or unexplained injuries

Unexplained gifts or new possessions could also indicate that individuals have been approached by, or are involved with, individuals associated with criminal networks o

Appendix Two

Glossary

A Child	A person who has not yet reached their 18 th birthday.
Abuse	A form of maltreatment. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Individuals may be abused in a family or community setting by those who know them or by others. They may be abused by an adults or children.
An Adult	A person who is 18 years old or over
Bullying & Cyberbullying	Behaviour that is repeated and intended to hurt someone either physically or emotionally. Bullying is often aimed at certain groups, for example, because of race, religion, gender or sexual orientation.
Child Protection	Activity that is undertaken to protect specific children who are suffering or are likely to suffer significant harm.
Children with Special Education Needs and/or disabilities	SEN – a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability – a physical or mental impairment which has long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
Contextual Safeguarding	An approach to understanding, and responding to, individual’s experiences of significant harm beyond their families. It recognises that the different relationships that people form in their neighbourhoods, schools and online can feature violence and abuse.
Early Help	Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person’s life
Gangs & Youth Violence	Defining a gang is difficult. They tend to fall into three categories: peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public areas to socialise, and although some peer group gatherings can lead to increased anti-social behaviour and low-level youth offending, these activities should not be confused with that of a Street Gang.
Hate	Hostility or prejudice based on one of the following things: <ul style="list-style-type: none"> • Disability • Race • Religion • Transgender identity • Sexual orientation

Honour Based Violence (HBV)	So-called 'honour-based violence' encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents, or cousins).
Radicalisation & Extremism	<p>Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.</p> <p>Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.</p>
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding Adults	Protecting the health, wellbeing and human rights of adults at risk, enabling them to live safely, free from abuse and neglect
Safeguarding Children	<ul style="list-style-type: none"> • Protecting children from maltreatment • Preventing impairment of children's health or development • Ensuring that children grow up in circumstances consistent with the provision of safe and effective care • Taking action to enable all children to have the best outcomes
Sexting	<p>Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages.</p> <p>They can be sent via any device that allows you to share media and messages.</p>
Trafficking	Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation.

	Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs
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Further Resources

Care Act 2014	Care Act 2014 (legislation.gov.uk)
Children and Social Work Act 2017	Children and Social Work Act 2017 (legislation.gov.uk)
Safeguarding Vulnerable Groups Act 2006	Safeguarding Vulnerable Groups Act 2006 (legislation.gov.uk)
Working Together to Safeguard Children 2018	Working together to safeguard children - GOV.UK (www.gov.uk)
Keeping Children Safe in Education 2021	Keeping children safe in education - GOV.UK (www.gov.uk)
Mental Health Act 1983 (amended 2007)	Mental Health Act 1983 (legislation.gov.uk)
Human Rights Act 1998	Human Rights Act 1998 (legislation.gov.uk)
GDPR and Data Protection Act 2018	Data protection - GOV.UK (www.gov.uk)
Information Sharing: Advice for Practitioners 2018	Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)
Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2018	Sexual violence and sexual harassment between children in schools and colleges - GOV.UK (www.gov.uk)
Criminal Exploitation of Children & Vulnerable Adults: County Lines Guidance	Criminal exploitation of children and vulnerable adults: county lines - GOV.UK (www.gov.uk)
Online Abuse & Bullying Prevention Guidance	Online abuse and bullying prevention guide - GOV.UK (www.gov.uk)
Coronavirus (COVID-19) Safeguarding in Schools, Colleges and Other Providers 2020	Coronavirus (COVID-19): safeguarding in schools, colleges and other providers - GOV.UK (www.gov.uk)
Counter-Terrorism and Security Act 2015	Counter-Terrorism and Security Act - GOV.UK (www.gov.uk)
Prevent Duty Guidance 2015	Prevent duty guidance - GOV.UK (www.gov.uk)
Serious Crime Act 2015	Serious Crime Act 2015 (legislation.gov.uk)
Preventing Youth Violence & Gang Involvement	Preventing youth violence and gang involvement - Practical advice for schools and colleges (publishing.service.gov.uk)
Wigan Safeguarding Children Board Policy	Guidance and policies (wiganlscb.com)
Wigan Safeguarding Adults Board Policy	Wigan policy and procedure (wigansafeguardingadults.org)