

Mercury College Safeguarding of Adults at Risk - Guidance

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1 Safeguarding Adults at Risk Guidance

Safeguarding is not just about protecting students and Adults at risk from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:

- Students' health and safety and well-being
- Positive Behaviour Support
- Meeting the needs of students with health and medical conditions
- Providing first aid
- Educational visits
- Intimate care and emotional well-being
- Online safety and associated issues - training is given to both students and colleagues
- Appropriate arrangements to ensure students' security, taking into account the Prevent Duty and local context.

Due to these broader aspects of care and education, Mercury College and Hesley Group as an organisation, adhere to a range of policies and procedures, which link to this local Mercury College Safeguarding Adults at Risk policy and guidance. Details of the range of policies can be found in our Mercury College Safeguarding Adults at Risk Policy.

1.1 Definitions and terminology used by Mercury college

Safeguarding

Safeguarding is defined as protecting an individual's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

Abuse

Abuse is a violation of a person's human or civil rights by another. It may be single or repeated acts. Abuse may be, physical, verbal, psychological/emotional, sexual, financial (relates to money, property or things a person owns), discriminatory, or institutional abuse, or an act of neglect or omission.

Abuse can take many forms and does not have to fit into any single category.

Student

A young person aged over 18, who attends the college.

Adult at risk

An adult who has needs for care and support (whether or not the local authority is meeting any of those needs) who is experiencing, or is at risk of, abuse or neglect, and as a result of those needs is unable to protect themselves against the abuse or neglect or risk of it.

Alerter/Reporter

The Alerter is the person who recognises the concern and alerts the Designated Safeguarding Lead; this can be a colleague, external person or the student. The reporter is the person who reports a concern; this can be a colleague, an external person or the student.

These are often the same person.

Harm

Irrespective of whether the impact is significant or not harm is any act by another that has the potential to adversely affect a person's health, wellbeing, development or infringes on their rights.

Ulysses

This is the electronic governance system used by Mercury College and Hesley Group to report concerns. It is also used to record other types of concern and incidents including behaviour incidents, compliments and complaints. Reports entered onto the system are reviewed and can be actioned by the Head of Education (or another senior manager where required). Reports made onto the Ulysses system can be viewed, monitored and actioned by members of the Hesley Group Quality team and Senior Executive team.

Report of Concern

A report of a concern is a type of report made internally onto the Ulysses electronic governance system; the Head of Education or other senior manager reviews the reports of concern and makes a safeguarding referral where required.

Head of Education

The person who is in charge at Mercury College

Designated Safeguarding Lead/ Deputy Designated Safeguarding Lead

The responsible person (or their deputy) for safeguarding at the college. The identity of these individuals can be found in this document and displayed around the college.

Safeguarding referral

Formally raising a concern with the local safeguarding team and/or Police in relation to a safeguarding concern.

Making Safeguarding Personal

Making safeguarding Personal is a person-centred and outcome focused approach to safeguarding adults. It emphasises that the adult concerned must always be at the centre of adult safeguarding, and that their wishes and views should be sought at the earliest opportunity.

Duty of Care

Duty of care means to safeguard from harm and promote the wellbeing of those in your responsibility. There are specific obligations and legal requirements that organisations and the college should follow to protect students from harm.

2 Understanding Abuse

2.1 Understanding Abuse

Abuse is always unacceptable; everyone has a right to be treated with dignity and respect. No one has the right to abuse another. Abuse can be a one-off act or something that happens over weeks, months or years. It can be accidental or deliberate. Just because there is, no injury, it does not mean there is no abuse.

Adult abuse is a complex issue. These guidelines are written on the basis that:

- The vast majority of education and support provided is of a good standard.



- All agencies, including Mercury College, are committed to working together to provide advice, support and assistance within a statutory framework, in order to prevent situations occurring which might lead to abuse.
- All adults have the right to express their wishes and to determine risks acceptable to themselves. Whilst we will make every effort to ensure individual's wishes are taken into account at every stage of the safeguarding process, Mercury College has a duty of care to its students and will make a safeguarding referral where required.
- The basic principles underpinning Mercury College's safeguarding policy and this guidance is that prevention should be a priority rather than the need to take protective action.

2.2.1 Who is an adult at risk?

The term adult at risk has been used to replace vulnerable adults. This is because the term vulnerable adult may wrongly imply that some of the fault for the abuse lies with the adult abused. An 'adult at risk' is defined under the Care Act 2014 as an adult who;

- has needs for care and support,
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect themselves from the risk of, or the experience of, abuse or neglect.

An adult who may be at risk therefore may be a person who:

- Is elderly and frail due to ill health, physical disability, or cognitive impairment.
- Has a learning disability.
- Has a physical disability, and or sensory impairment.
- Has mental health needs including dementia or a personality disorder.
- Has a long-term illness/ condition.
- Misuses substances/alcohol.
- Is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse.
- Is unable to demonstrate the capacity to make a decision and is in need of care and support.

This list is not exhaustive.

2.3 Different Types of Abuse and How to Spot the Signs

There are many different types of abuse that an individual can experience; below is a list of the different forms of abuse and their "indicators" (signs) that all should be aware of. Colleagues and managers should be mindful that the individuals we support may not recognise or be able to communicate if they are being abused and they may exhibit behaviour which is indicative of abuse. Therefore, it is critical that colleagues and managers remain alert to the signs of abuse and ensure that all concerns are reported in line with our Safeguarding Adults at risk policy and guidance.

You can also find information about the different types of abuse within the Safeguarding Adults Booklet P&S 2.1.1.

"Colleagues and managers should be mindful that the individuals we support may not recognise or be able to communicate if they are being abused and they may exhibit behaviour which is indicative of abuse."

2.3.1 Physical Abuse

Physical abuse includes; assault, hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate sanctions or force-feeding, inappropriate methods of restraint, and unlawfully depriving an individual of their liberty. Some indicators are:

- Unexplained or inappropriately explained injuries
- Exhibiting untypical self-harm
- Unexplained cuts or scratches to mouth, lips, gums, eyes or external genitalia
- Unexplained bruising to the face, torso, arms, back, buttocks, thighs, in various stages of healing. Collections of bruises that form regular patterns which correspond to the shape of an object or which appear on several areas of the body
- Unexplained burns on unlikely areas of the body (e.g. soles of the feet, palms of the hands, back), immersion burns (from scalding in hot water/liquid), rope burns, burns from an electrical appliance
- Unexplained or inappropriately explained fractures at various stages of healing to any part of the body
- Medical problems that go unattended
- Sudden and unexplained urinary and/or faecal incontinence - evidence of over/under-medication
- Flinching at physical contact
- Appears frightened or subdued in the presence of particular people

2.3.1.1 Unexplained Injuries

Unexplained or inconsistently explained injuries must always be treated as potential indicators of abuse or neglect. Colleagues must never assume an injury is accidental. All such injuries must be:

- Reported immediately to the Designated Safeguarding Lead for review and safeguarding consideration.
- Recorded without delay using the appropriate body map, capturing the precise location, size, colour and type of injury. The individual's own account must be recorded using their exact words, and colleagues must avoid assumptions or speculative interpretation.
- Linked to a Ulysses report and referenced in the individual's daily notes to enable monitoring, pattern recognition and timely escalation where required.

2.3.1.2 Use of Photographs

Colleagues must not take photographs of injuries unless this has been:

- Directed by safeguarding partners (e.g., Local Authority, Police), or
- Requested by a medical professional for assessment or treatment purposes.

In all such cases, the name of the professional and the reason for taking the photograph must be clearly recorded in the Ulysses report. Where photographs are authorised, a



Hesley Group device must be used, and images must be securely stored, shared and removed from the device in line with organisational procedures.

2.3.1.3 Consent, Mental Capacity and Best Interest Considerations

The taking of photographs for safeguarding or clinical purposes must always be underpinned by clear consideration of the individual's capacity and consent:

- Wherever possible, the individual's informed consent must be obtained before photographs are taken and recorded.
- If there is doubt about the person's ability to consent, colleagues must ensure a Mental Capacity Assessment is completed in line with the Mental Capacity Act.
- Where the individual lacks capacity, a Best Interest decision must be made and recorded, considering the individual's rights, dignity and protection need.
- Photographs must never be taken solely on the basis of a colleague's judgement; capacity, consent, and lawful justification must be established first.

All injuries including recurrent or multiple unexplained injuries must be escalated to the Designated Safeguarding Lead for safeguarding consideration in line with policy thresholds – See how to report a concern below.

2.3.2 Psychological or Emotional Abuse

Psychological abuse incorporates "emotional abuse" and includes; threats of harm or abandonment, deprivation of contact, humiliation, rejection, blaming, controlling, intimidation, coercion, harassment, verbal abuse (including shouting or swearing), cyberbullying, isolation or withdrawal from services or support networks.

It is the denying of an individual's human and civil rights including; choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation. It includes preventing the individual from using services that would support them and enhance their lives. It also includes the intentional and/or unintentional withholding of information (e.g. information not being available in different formats/languages etc.). Some indicators are:

- Appears anxious or withdrawn, especially in the presence of the alleged abuser
- Exhibits low self-esteem
- Changes in behaviour (e.g. continence problems, sleep disturbance)
- Is not allowed to interact with other students
- Is locked in a room/in their home or college
- Is denied access to communication aids or equipment, (e.g. PEC's book, communication tablet, glasses, dentures, hearing aid, crutches, etc.)
- Access to personal hygiene and toilet is restricted
- Movement is restricted by the use of furniture or other equipment
- Bullying via social networking internet sites and persistent texting.

2.3.3 Financial or Material Abuse

Financial (or material) abuse includes; theft, fraud, internet scamming, coercion of an individual's financial affairs or arrangements such as with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. Some indicators are:



- Lack of heating, clothing or food
- Inability to pay bills/unexplained shortage of money
- Lack of money, especially after benefit day
- Inadequately explained withdrawals from accounts
- Unexplained loss/misplacement of financial documents
- The recent addition of authorised signatories on an adult's accounts or cards
- Disparity between assets/income and living conditions
- Power of attorney obtained when the adult lacks the capacity to make this decision
- Recent changes of deeds/title of house or will
- Recent acquaintances expressing sudden or disproportionate interest in the adult and their money
- Service user not in control of their direct payment or individualised budget
- Illegal money-lending

2.3.4 Sexual Abuse

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

It includes penetration of any sort, incest and situations where the person causing harm touches the abused individual's body (e.g. breasts, buttocks, genital area), exposes their genitals (possibly encouraging the abused individual to touch them) or coerces the abused individual into participating in or looking at pornographic videos or photographs. Denial of a sexual life to consenting adults is also considered abusive practice.

Any sexual relationship that develops between adults where one is in a position of trust, power or authority in relation to the other (e.g. tutor/ learning support assistant/ support worker/social worker/health professional etc.) may also constitute sexual abuse. Some indicators are:

- Urinary tract infections, vaginal infections or sexually transmitted diseases that are not otherwise explained
- Appears unusually subdued, withdrawn or has poor concentration
- Exhibits significant changes in sexual behaviour or outlook
- Experiences pain, itching or bleeding in the genital/anal area
- Underclothing is torn, stained or bloody
- A woman who lacks the mental capacity to consent to sexual intercourse becomes pregnant

Sexual exploitation of individuals with care and support needs involves; exploitative situations, contexts and relationships where the individual (or a third person) receives 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing sexual activities, and/or others performing sexual activities on them.

Sexual exploitation can occur through the use of technology without the individual's immediate recognition. This can include being persuaded to post sexual images or videos on the internet or a mobile phone with no immediate payment or gain, or being sent such



an image by the person alleged to be causing harm. In all cases, those exploiting the individual have power over them by virtue of their age, gender, intellect, physical strength, and/or economic or other resources.

2.3.5 Neglect and Acts of Omission

Neglect and acts of omission include; ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the individual or to others, particularly when the individual lacks the mental capacity to assess risk for themselves.

Neglect and poor professional practice may take the form of isolated incidents or pervasive ill treatment and gross misconduct. Neglect of this type may happen within an individual's own home, college or in an institution. Repeated instances of poor care may be an indication of more serious problems. Neglect can be intentional or unintentional. Some indicators are:

- Has inadequate heating and/or lighting
- Physical condition/appearance is poor (e.g. ulcers, pressure sores, soiled or wet clothing)
- Malnourished, has sudden or continuous weight loss and/or is dehydrated
- Cannot access appropriate medication or medical care
- Is not afforded appropriate privacy or dignity
- Has inconsistent or reluctant contact with health and social services
- Callers/visitors are refused access to them and frequent non-attendance at college without appropriate reason
- Exposed to unacceptable risk

2.3.6 Organisational or Institutional Abuse

Organisational (or Institutional) abuse includes; neglect and poor care practice within an institution or specific education or care setting including where care is provided within someone's home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Organisational abuse is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use. Such abuse violates the individual's dignity and represents a lack of respect for their human rights.

Organisational abuse occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care, support and poor practice which affect the whole setting and deny, restrict or curtail the dignity, privacy, choice, independence or fulfillment of adults with education, care and support needs. Some indicators are:

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care and support
- 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 support plans for students
- Lack of management overview and support

2.3.7 Self Neglect

Self-neglect includes neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It is also defined as the inability (intentional or unintentional) to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and wellbeing of the individual and sometimes to their community.

Some indicators are:

- Living in very unclean, sometimes verminous, circumstances
- Poor self-care leading to a decline in personal hygiene
- Poor nutrition
- Poor healing/sores
- Poorly maintained clothing
- Isolation
- Failure to take medication
- Hoarding
- Neglecting household maintenance

2.3.8 Domestic Abuse

Domestic abuse includes; an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality. It also includes psychological, physical, sexual, financial, emotional abuse and 'honour-based' violence - female genital mutilation and/or forced marriage.

Many think that domestic abuse is restricted to abuse between intimate partners, but this is incorrect. It actually extends to other family members as well and a great deal of the safeguarding work that occurs at home is in fact concerned with domestic abuse. This confirms that domestic abuse approaches and legislation can be considered safeguarding responses in appropriate cases. Some indicators are:

- 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 friends and family
- Limited access to money

2.3.9 Modern Slavery



Modern slavery includes; slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A large number of active organised crime groups are involved in modern slavery but it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

Some indicators are:

- Not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else
- Has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred
- Looks malnourished, unkempt, or appears withdrawn
- Have few personal possessions and often wear the same clothes
- Clothes they do wear may not be suitable for their work
- Withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live
- Appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.
- Fear of authorities
- Perceives themselves to be in debt to someone else or in a situation of dependence

2.3.10 Discriminatory Abuse

Discriminatory abuse includes; discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on an individual's disability or any other form of harassment, slur or similar treatment. Hate crime can be viewed as a form of discriminatory abuse, although will often involve other types of abuse as well. It also includes not responding to dietary needs and not providing appropriate spiritual support. Excluding an individual from activities on the basis they are 'not liked' is also discriminatory abuse. Some indicators are:

- May reject their own cultural background and/or racial origin or other personal beliefs, sexual practices or lifestyle choices
- Making complaints about the service not meeting their needs.

2.4 Other Concerns to Consider

2.4.1 Radicalisation or Extremism

Radicalisation is the process through which individuals come to support increasingly extreme political, religious or other ideals. This can lead them to support violent extremism and terrorism. People can "self-radicalise" by reading or listening to extremist literature or speakers. More commonly, there may be an individual or group actively seeking to persuade others to adopt their views.

Belief in an extremist cause and membership of an extremist group can offer people a



sense of purpose, identity and community. This may be particularly appealing to someone who is experiencing difficulties and challenges in their life. Some indicators are:

- Isolation or withdrawal from family and friends
- Obsession with and secrecy around the internet and social networking sites
- Becoming uncooperative and disengaged
- Using abusive, aggressive or extremist views, comments, threats and/or language
- Fascination with weapons, chemicals, explosives or extremist activity and events
- Significant changes in relationships
- Use of seemingly scripted speech
- Change in behaviour or appearance due to new influences
- Seeking to recruit or groom others to an extremist ideology
- Possession of violent extremist literature

All colleagues are given training and information with regards to the PREVENT strategy, including what signs they should be aware of.

For more information see Guidance on Extremism and Radicalisation – PREVENT P&S 2.1.12.

2.4.2 Online Safety and Cyberbullying

Cyberbullying can be defined as the use of Information Communication Technology, particularly mobile phones and the internet to deliberately hurt or upset someone.

Individuals can engage in, or be a target of, bullying using a range of methods including text, phones or social network sites to reach their target. Individuals may not know who's bullying them online, or it may be an extension of offline peer bullying. Cyberbullying can happen at any time or anywhere, an individual can be bullied when they are alone in their bedroom, so it feels like there is no escape.

Mobile phones are also used to capture violent assaults of other individuals for circulation. This form of bullying is a growing problem. It should be taken seriously by anybody who becomes aware of it. Harassment by use of ICT is a criminal offence and if necessary, concerns should be reported to the Police. Some indicators are:

- Appears nervous when receiving a text, instant message, or email
- Unwillingness to share information about online activity
- Unexplained anger or depression, especially after going online
- Abruptly shutting off or walking away from the computer mid-use
- Withdrawing from friends and family in real life
- Unexplained stomachaches or headaches
- Trouble sleeping at night
- Unexplained weight loss or gain
- Suicidal thoughts or suicide attempts

2.4.3 Student on Student Abuse

Peer on Peer Abuse is defined as a serious form of bullying (abuse) between persons of a similar age and as such has wider safeguarding implications. Some indicators are:

- Unexplainable injuries



- Lost or destroyed clothing, books, electronics, or jewelry
- Frequent headaches or stomach aches, feeling sick or faking illness
- Changes in eating habits, like suddenly skipping meals or binge eating
- Difficulty sleeping or frequent nightmares
- Loss of interest in program or activities, or not wanting to go or to participate
- Sudden loss of friends or avoidance of social situations
- Feelings of helplessness or decreased self-esteem
- Self-destructive behaviors such as running away from home, harming themselves, or talking about suicide
- Gets into physical or verbal fights

2.4.4 *Exploitation – County Lines*

County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves a young person’s criminal exploitation (CCE) as gangs use young and vulnerable people to move drugs and money.

Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’. Colleagues working in Supported Living and single services need to be vigilant as to the motives of visitors to properties.

Gangs are known to target young people and adults at risk; some of the factors that increase a person’s risk include:

- Being in care (particularly those in residential care and those with interrupted care histories).
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other people involved in gangs.
- Having a physical or learning disability.
- Having mental health or substance misuse issues.

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any young person (male or female) under the age of 18 years.
- Can affect any Adult at Risk over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults.
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim

who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim.

Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from home and/or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts/phone calls
- Relationships with controlling/older individuals or groups
- Suspicion of physical assault/unexplained injuries
- Carrying weapons
- Significant decline in academic results/performance
- Gang association
- Self-harm or significant changes in emotional well-being.

For more information see:

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#) Updated 2023

2.4.5 *Cuckooing*

Cuckooing is a form of exploitation where individuals or criminal groups take over the home of an adult at risk to use it for illegal purposes, including drug storage, drug dealing (linked to county lines), financial exploitation or other criminal activity. Adults with learning disabilities, mental health needs, substance misuse issues or limited social networks may be particularly vulnerable.

Signs may include:

- An increase in unknown visitors to the person's home
- Sudden changes in behaviour, routines or financial circumstances
- Decline in living conditions or evidence of substances/paraphernalia
- The individual appearing fearful of certain people or reluctant to discuss visitors
- Loss of control over who enters their home

Any concern that a student or adult at risk may be subject to cuckooing must be reported immediately to the Designated Safeguarding Lead for urgent action.

2.5 Historic Abuse

Incidents of abuse reported to us by a student that may be recent or historical, or may have already been investigated, will be reported and referred by Mercury College to the appropriate agency or service.

Some instances of abuse will constitute a criminal offence. In this respect, students are entitled to the protection of the law in the same way as any other member of the public.

2.6 Transitional Safeguarding

Young people at Mercury College are aged 18 to 25 years old. As Young people transition from children to adult services they can face heightened vulnerability as support structures change.

Risks such as exploitation, unsafe relationships, mental ill-health and reduced service involvement may continue beyond age 18. Some young people, especially those with disabilities, care experience or complex needs, may be particularly affected.

Mercury College is committed to providing flexible, developmentally-appropriate safeguarding during this period. Colleagues should work jointly across children's and adults' services, share information appropriately, and support young people to understand their rights, make informed decisions, and access the help they need to stay safe.

2.7 Contextual Safeguarding

Students may be exposed to risks outside the home or college environment, including within the community, online or within peer groups. Colleagues must consider the wider context of a student's life when assessing risk.

2.8 Missing from Education

Patterns of unexplained or repeated absence may be an indicator of abuse, exploitation, domestic abuse, neglect or mental health concerns. Colleagues must report concerns about absence patterns to the DSL for further review. See also [P&S 3.10MC](#) Missing from Education Policy and [P&S 3.9MC](#) Student Attendance Policy

2.6 Think Family Approach

Colleagues must remain mindful that safeguarding concerns affecting a student may also affect, or be affected by, issues within the wider family. Concerns involving siblings, parents or household members may increase risk, and colleagues should follow reporting procedures if wider family harm is identified.

3 **Preventative Procedures**

3.1 Recruitment

Mercury College has robust systems and processes in place to ensure the safe recruitment of all employees and volunteers within the organisation who come into contact with students and work within the college and for those responsible for the College as the 'provider'. This includes undertaking the relevant and appropriate checks with the Disclosure and Barring service.

No external applicant can commence in a position within the college until all pre-employment checks have been completed, received and are deemed to be satisfactory. Further information is available within our Recruitment policy, [Per 2.1.](#)

3.2 Disclosure and Barring Service

Anyone who wishes to work for the company will be subject to Disclosure and Barring Service (DBS) check; the type of check performed will be relevant to the role that has been applied for. The majority of colleagues working within Mercury College will require an enhanced DBS check.



Colleagues will only be able to work within the service once their DBS check has returned and highlights no issues (some issues that are found may require a further in depth conversation and/or action to allow the colleagues member to begin working). Employed colleagues will also be subject to a three-yearly DBS renewal and are encouraged to register with the DBS update service.

For more information regarding this, see Vetting policy, [Per 2.5](#).

3.3 Training

When new colleagues join Mercury College, they complete a 3-week corporate induction-training programme. During this induction all colleagues receive a copy of the "Code of Conduct for Employees" booklet and a copy of the 'Safeguarding Adults' booklet.

Safeguarding training includes (but is not limited to):

- Understand the importance of providing high quality education and support
- Know the actions they must take in raising and reporting a concern
- Understand what abuse, neglect or poor practice might involve
- Can identify the early indicators of abuse or neglect
- Understand the importance of always referring to local safeguarding and protection procedures and protocols provided by commissioners
- Understand the importance of reporting all incidents & accidents that involve students
- Training in specific safeguarding areas including Prevent and radicalisation and e-safety.

Safeguarding training for all colleagues, managers, senior leaders and executive and board members is appropriate to the role being undertaken and refreshed on an at least annual basis.

Designated Safeguarding Leads and their deputies will undertake more advanced safeguarding training appropriate to the role.

Mercury College expects all colleagues to ensure that their safeguarding training remains up to date, is refreshed at least annually and that all colleagues attend the provided training.

More information about mandatory training is available within the Workforce Development policy, [Per 3.1](#)

3.4 Supervision, Appraisal and Probation

All colleagues throughout their time with the company will be designated a supervisor who will provide line management, supervision and support with their development and performance within their role.

New colleagues or colleagues who take up a new position within the company are subject to a probationary period of 6 months and should meet with their line manager at, at least monthly intervals throughout their probationary period.

The colleagues should receive regular supervision and safeguarding as a topic should be



discussed at each session to ensure the colleagues has the required knowledge and understanding for their role.

Regular supervision provides additional opportunities for colleagues to highlight any potential safeguarding concerns they may have.

For more information regarding this, see policies; Probationary Period of Employment – Adult Services, [Per 2.2](#), Probationary Period of Employment, [Per 2.2B](#), and Employee Supervision and Appraisal Policy [Per 4.6](#).

3.5 Information, Posters and Leaflets

Mercury College displays posters in student and colleague areas to tell people how to report a concern and who the Designated Safeguarding Leads are.

Leaflets are available for contractors and visitors to the college about the safeguarding arrangements that are in place, expectations of visitors at the college and how concerns can be raised.

4 **Guidance on How to Report a Concern**

For the purposes of clear and effective safeguarding policy and practice, Mercury College has internal processes for referring and managing safeguarding concerns and alerts during the student's college day.

The college day is classed as time when the college is open according to the College calendar and the student is in attendance. College time is generally between 9am and 3pm. On occasion, the Head of Education may vary these hours. Variations will be communicated to students, families and carers well in advance. The "college day" will include any educational trips or visits away from the college site.

4.1 Reporting a concern

Despite all precautions, there will be occasions when there is suspicion or knowledge that abuse has occurred, is occurring or is at risk of occurring. Our colleagues need to be confident in reporting their concerns and confident that they will be followed up promptly and thoroughly.

As soon as you become aware of or suspect abuse or potential abuse, you should contact the Designated Safeguarding Lead (DSL) for Mercury College or one of their Deputies. Please see below for contact details of the DSL and the Deputy DSL at Mercury College.

Posters are displayed around the college to tell you who is the Designated Safeguarding Lead on duty.

Concerns and allegations received will be taken extremely seriously and followed up by the Designated Safeguarding Lead or their Deputy using the agreed local reporting procedures.

We have procedures in place to support and protect the person who has spoken up (See Speaking Up Policy and Practice Guidance, [Corp 5.1](#), and Speaking Up Charter, [Corp 5.1.1](#)).

Information relating to an allegation of abuse is confidential. You must not share it with anyone other than those people who need to know. Please do not discuss the matter with



your colleagues.

The person who needs to know your concerns or allegations is the Designated Safeguarding Lead or their Deputy. They will support you to complete a Report of Concern report on the Ulysses system. This will record the details of what happened, where, how and who else was there, etc. The DSL or Deputy will then assess the situation and if necessary, report the matter to the local Adult safeguarding team in Doncaster and/ or the Police.

The Designated Safeguarding Lead or deputy may ask you to complete a written statement if you are not able to complete the Ulysses report, The Designated Safeguarding Lead will attach to the report of concern on Ulysses.

Mercury College manages all safeguarding information in line with the Data Protection Act 2018 and UK General Data Protection Regulation (UK-GDPR). Information will only be shared where it is lawful, necessary and proportionate to protect an individual from harm.

Mercury College recognises the importance of early identification of emerging needs. Where concerns do not meet the threshold for a safeguarding referral, colleagues should seek guidance from the DSL regarding early help pathways or internal support measures to prevent escalation.

4.2 How to report a concern – Step-by-Step Guidance

The Alerter/ Reporter identifies a concern or allegation

Step 1:

- Make sure everyone is safe now. If they are not, take immediate action to make them safe, this may include calling the police or other emergency services if you are unable to make them safe until the Designated Safeguarding Lead (or their deputy) is informed – Generally the Designated Safeguarding Lead will make the decision to contact emergency services however in an emergency do not wait to call for support and 999.
- React calmly so as not to frighten or alarm the person. Listen to what they have to say.
- Tell them they were right to tell and tell them that they are not to blame. Communicate with the student in a way that is appropriate to their needs.
- Take what they say seriously.
- Reassure them that the information will be kept private but that you have to tell certain people to make sure action is taken, and also it is part of your job to make sure people are kept safe.
- Ask only questions, which will clarify the nature of the allegation or concern. You MUST NOT try to collect any evidence or investigate the concern yourself. This could seriously damage chances of a safe and fair investigation, the Designated safeguarding lead (or their deputy) will consider what further actions need to be taken and by who.

Step 2:

- Inform the Designated Safeguarding Lead – Unless they are part of the allegation (see alternate contacts below). If needed tell the person in charge that you need to



contact the Designated Safeguarding Lead and they will arrange for you to have your duties covered if required.

- If the Student wants to call the police immediately, they should be supported to do so however, the Designated Safeguarding Lead or someone designated by them will generally provide this support.
- If you don't feel that the Designated Safeguarding lead takes the concern or allegation seriously you should contact the Director of Education (see contact details below).

Step 3:

- Complete a Report of Concern on the Ulysses System.
The Designated Safeguarding Lead will support you to complete and report the concern if required. If, for any reason, you are unable to access the system you will be asked to complete a written statement about the allegation or concern. This will be entered and attached to the Ulysses report by the Designated Safeguarding Lead as soon as possible.

Concerns should be reported immediately to the Designated Safeguarding Lead.

Ulysses reports should be completed as soon as possible; this should be on the same college day as the concern is identified.

Do not:

- Do not put off taking action.
- Do not leave it to someone else to help the adult at risk.
- Do not assume that someone else knows about the concern already
- Do not assume that someone else will report the concern – It is much better to have the same concern reported multiple times than not at all.
- Do not be afraid to voice your concern – the adult at risk may need urgent safeguarding.
- Do not promise not to tell.
- Do not begin your own investigation.

Please Note: It is not the Reporter/ Alerter's job to decide if abuse has taken place.

4.3 The role of the Designated Safeguarding Lead and their Deputies.

Mercury College has a named Designated Safeguarding Lead who is the Head of Education.

The Designated Safeguarding Lead provides advice, support and guidance to colleagues in relation to all safeguarding issues, concerns and allegations at the college. They are responsible for establishing links with relevant personnel within the local safeguarding adult's team and the police.

The Designated Safeguarding Lead will appoint a deputy(ies) who will undertake the role when they are not available e.g. away from the college on training or leave.

The Designated Safeguarding Lead and their deputy have received relevant and appropriate training to undertake the role and are given access to appropriate resource materials and support within the wider organisation.



The Designated Safeguarding Lead will meet regularly with any deputy and periodically with an appropriately qualified member of the quality team to share ideas, experiences and reflect on learning.

- **Designated Safeguarding Lead (DSL):**

Victoria Sulston – Deputy Head of Education

Direct Line: 01709 861663

Mobile: 07483958680

Email: Victoria.sulston@mercurycollege.co.uk

- **Deputy Designated Safeguarding Leads (DDSLs):**

Caroline Richardson - Acting Head of Education

Direct line: 01709 861663

Mobile: 07717378097

Email: caroline.richardson@mercurycollege.co.uk

Laura Taylor – Head of Education

Direct line: 01709 861663

Mobile: 07384 253700

Email: laura.taylor@mercurycollege.co.uk

Danielle Sidall

Direct Line: 01709 861663

Mobile: 07825236960

Email: danielle.sidall@mercurycollege.co.uk

If your concern is about the conduct of the DSL and you think a student has been abused or is at risk of abuse, you should contact the **Director of Education, Fenella Dowler-Luke on 01709 861663** or the **Head of Safeguarding and Governance, Maryann Barton on 01302 866906**

Concerns relating to those deputising should be passed immediately to the college Designated Safeguarding Lead or to one of the contacts as above.

If, after raising concern, you feel the matter has not been treated with sufficient gravity, you must contact the **Director of Education, Fenella Dowler-Luke on 01709 861663** or the **Head of Safeguarding and Governance, Maryann Barton on 01302 866906** Alternatively, you may contact the local safeguarding Team in Doncaster.

External Contact Details:

Doncaster Safeguarding Adults

SAH@doncaster.gov.uk

Telephone: 01302 737063

Out of Hours: 01302 796000

4.5 Managing a Concern - Step-by-Step Guidance

The Designated Safeguarding Lead (or their deputy) is alerted to a concern or allegation.

Step 1:

- Ensure the students and colleagues members are all OK and safe – If not take any immediate action required

Step 2:

- Check all of the actions for the Alerter/ Reporter as above are complete.
- Support the Alerter/ Reporter to record the concern on Ulysses.
- Collate all relevant information from the initial fact find and record onto the Ulysses report.
- Review the information and decide if a referral to the Local Authority Safeguarding team and/or Police is required.

If a referral is to be made tick 'yes' on the Ulysses report of concern to open the safeguarding module on the system.

If a referral is not going to be made tick 'No' and record your rationale for the decision on the managers form.

The decision in relation to making a safeguarding referral should be made as soon as possible and within 24 hours of a concern being raised with the Designated Safeguarding Lead.

Step 3:

- If the student wants to call the police immediately support their decision to do so. It is sometimes better if we contact the police once we have talked the issue through with the Local Authority Safeguarding Team, but if the student wants to call the police, immediately support them to do so.

Step 4:

- Complete a referral to the local Safeguarding Team. Agree on an immediate plan which includes communicating with police and if appropriate, family members and carers, the student's home local authority / social worker, the alleged perpetrator, other students and colleagues. Remember we are unable to investigate the concern or share information until we have permission from the Local Safeguarding team and/or the Police to do so.
- Where a student lives within a Hesley Group residential care home or receives a support from our supported living service the Designated Safeguarding Lead of Mercury College will inform the Registered Manager about the concern and Safeguarding referral. The Ulysses report will not be automatically accessible to the Registered Manager unless it is deemed appropriate to give them access to it via an additional notification within the system.
- Whilst senior managers receive and are able to monitor reports on the Ulysses system the Designated Safeguarding Lead should ensure that the Director of Education is informed of the safeguarding referral directly and as soon as possible.
- Alert the HR People Partner where the alleged perpetrator is a member of colleagues. Managers must consult with HR where suspension without prejudice of a colleagues member is being considered, see The Use of Suspension Per 4.1.2

Referrals to Doncaster Safeguarding Adults team can be made online at <https://www.doncaster.gov.uk/doitonline/reporting-a-safeguarding-concern>

By Telephone:

- Emergency out of hours number: 01302 796000



- For general information, advice and guidance about safeguarding adults call the safeguarding adults unit on: 01302 737063

To report a crime to the police, use the following numbers:

In an emergency: 999

Non-emergency: 101

Children's Safeguarding.

All students at Mercury College are adults aged over 18 years old and therefore the adult safeguarding process will be followed.

However, our duty to safeguarding extends to all individuals who may be at risk and concerns about children must always be treated with the same urgency, professionalism and commitment as concerns about adults.

If a concern is identified about a child or young person aged under 18 who is at risk, Doncaster's safeguarding children procedures will be followed and a referral to children's social care will be made.

Information about this process can be found here or

<https://www.doncaster.gov.uk/doitonline/safeguarding-concern-child-at-risk-report-form>

Where a concern about a child or young person aged under 18 involves an allegation against a colleagues member, carer and/ or volunteer a referral will be made to the Local Authority Designated Officer (LADO).

Information about the Doncaster Safeguarding Children Board (DSCB) Procedure for Allegations against colleagues, Carers and Volunteers can be found here or

https://doncasterscb.proceduresonline.com/p_alleg_against_colleagues.html

All referrals reported to Local Authority Children's services or to the LADO follow our safeguarding procedures, they are recorded onto our Ulysses system and the Hesley Group Head of Safeguarding and Governance must be alerted, contact details are listed in Section 5.

Step 5:

- Follow any agreements for immediate action that were made and remain in regular contact with the adult safeguarding team and/or the Police.
- Record all actions taken and the reason for them, communication with other agencies, individuals, and relevant information and into the safeguarding report on Ulysses. The Ulysses record should be kept up to date at all times.
- Ensure that the student and any colleagues involved are provided with support and update them as appropriate.

Step 6:

- When permission has been given and where required, undertake an internal investigation. Escalate any additional concerns or new information from the investigation to the Local Safeguarding Team and/or the Police where required.
- Once the investigation and any associated, internal processes are completed feedback the outcome to the Local Safeguarding Team and/or the Police as required.
- Provide agreed feedback about the outcome to the Student, Alerter/ Reporter and other parties as required.



Remember it isn't possible or appropriate to provide all the details to the person you are providing feedback to however, everyone should know that the safeguarding concern has been dealt with, be provided with an overview of the outcome and information about what they can do if they don't feel that the concern has been dealt with seriously or appropriately. Whilst we might be able to share an overall outcome with some parties, we cannot share details or outcomes from our internal disciplinary processes with students, the Alerter/ reporter, other colleagues, families or carers. Please seek advice from HR if required.

- Update the Ulysses report ensuring that all actions taken and the outcome is recorded. Close the report of concern and the safeguarding module. Remember to share any lessons learned with colleagues and other managers to support good safeguarding practice.

Do not:

- Do not put off taking action.
- Do not leave it to someone else to help the adult at risk.
- Do not be afraid to voice your concern – the adult at risk may need urgent safeguarding
- Do not promise not to tell.
- Do not begin your own investigation.

Further advice and guidance about making or managing a safeguarding referral can be sought internally from the Quality team. Managers are able to discuss safeguarding concerns directly with the Doncaster safeguarding Adult team, contact details are provided above.

If advice or guidance about the use of the Ulysses system is required please contact a member of the Quality team.

4.6 When Not to Inform Parents/ Carer or Family Members

While Mercury College values openness and partnership with parents and carers, there are circumstances where informing a student's family may place the student at further risk or compromise an investigation. Colleagues must seek guidance from the Designated Safeguarding Lead if any of the following apply:

- The concern involves allegations or suspicions of sexual abuse
- There is suspected or confirmed honour-based abuse, forced marriage or female genital mutilation
- Domestic abuse is present within the family environment
- There are concerns relating to radicalisation or extremism
- The student expresses a clear wish that information should not be shared, and they have capacity to make that decision
- The Designated Safeguarding Lead identifies that sharing information would create additional risk to the student or interfere with police or social care processes

In such situations, a safeguarding referral will be made directly to the relevant authority without parental notification.

4.7 Speaking Up

All colleagues, students, visitors and contractors to Mercury College are supported to raise a concern should they feel the need to do so. Details about how to raise a concern are



displayed in the student and colleague areas of the college, available within our visitor and contractor leaflet and within this policy.

Our aim is that all colleagues, students, visitors and contractors to Mercury College are supported and comfortable to raise a concern and that they are assured that appropriate action will be taken with the concern being resolved as swiftly, fairly and as appropriately as possible. Further information is available within our Speaking Up Policy, Corp 5.1

4.8 Safecall

We aim for all our colleagues to be able to raise concerns using our internal processes including the process outlined within this guidance. In addition, Hesley Group provides an independent whistleblowing hotline for colleagues; the company "Safecall" are contactable any day and at any time. Posters and leaflets with the contact details for Safecall are displayed and available within the colleagues' areas and detailed below.

You can contact and submit a concern by:

Calling them on 0800 915 1571

Submitting an online concern at <https://www.safecall.co.uk/report>

4.9 Low Level Concerns

A low-level concern relates to any behaviour of a member of colleagues, volunteer, contractor or visitor that does not meet the threshold for a safeguarding allegation but nevertheless causes a sense of unease, worry or "nagging doubt." Examples include boundary confusion, unprofessional language, favouritism or behaviour that could be misinterpreted.

All low-level concerns must be reported to the Designated Safeguarding Lead as they may form part of a wider pattern requiring action. Mercury College promotes a culture where colleagues feel confident to report low-level concerns without fear of reprisal.

4.7 Capacity and Consent

Colleagues have a duty to report issues of potential safeguarding. The Local safeguarding team will assess the person's capacity to be involved and participate in the Safeguarding process when a concern has been raised.

Where an individual has requested that information or concerns are not shared, there are circumstances where colleagues can reasonably override such a decision as we have a duty of care to all of our students, including:

- The student lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the Mental Capacity Act.
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent.
- Other people or students are, or may be, at risk.
- Sharing the information could prevent a serious crime.
- A serious crime has been committed.
- The risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral.
- Colleagues are implicated.

- There is a court order or other legal authority for taking action without consent

In law, every adult has the right to make their own decisions and is assumed to have capacity to do so unless it is proved that they do not. Where there are concerns about the capacity to consent of the person about whom the alert is being raised, the necessary assessment of Mental Capacity, and where relevant Deprivation of Liberty application and should be made. During the next stages, key considerations are:

- Deciding whether a mental capacity assessment is needed to clarify issues of consent.
- The need for the person at risk to be represented by an advocate including an IMCA Independent Mental Capacity Advocate.
- Supporting and enabling the adult at risk to achieve outcomes that they see as the best for them, where possible.
- Support and encourage participation for adults at risk to make decisions that they are able to make.
- Taking action to protect and support the adult.
- Assessing and addressing the risk.
- Taking into account the least restrictive measures, to enable the person undertake every day activities and events of their choice.
- Taking appropriate action for the person causing harm.
- Taking appropriate action with the service and/or its management to support the person.

5 Useful Contacts

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Laura Taylor Head of Education	Direct line: 01709 861663 Mobile: 07384 253700 Email: laura.taylor@mercurycollege.co.uk
Deputy DSL	Caroline Richardson Acting Head of Education	Direct line: 01709 861663 Mobile: 07717378097 Email: caroline.richardson@mercurycollege.co.uk
Deputy DSL	Victoria Sulston Deputy Head of Education	Direct Line: 01709 861663 Email: Victoria.sulston@mercurycollege.co.uk
Deputy DSL	Sara Silva Neagle Hub Manager	Direct Line: 01709 861663 Mobile: 07483 350999 Email: sara.silvaneagle@mercurycollege.co.uk
Director of Education	Fenella Dowler-Luke	Direct Line: 01709 861663 Mobile: 07767116290 Email: Fenella.dowler-luke@mercurycollege.co.uk
Head of Safeguarding and Governance	Maryann Barton	Direct Line: 01302 866906 ex 1132 Email: Maryann.barton@hesleygroup.co.uk



Adult Social Care Safeguarding team.	Doncaster Safeguarding Adults team.	Telephone: 01302 737063 Out of Hours: 01302 796000 Email: SAH@doncaster.gov.uk
Police	South Yorkshire Police	Tel: 999 if you believe a young person is suffering or likely to suffer from harm, or is in immediate danger. Tel 101 if you are seeking advice You can report a crime that is not an emergency on: https://www.police.uk/you/contact-the-police/report-a-crime-incident/
Independent Whistleblowing hotline	Safecall Available 24/7, 365 days a year	Tel: 0800 915 1571 Online: https://www.safecall.co.uk/report

