

Safeguarding Children and Adults at Risk and Prevent Policy 2025 - 2026

BACKGROUND

RHACC ensures full compliance with all relevant safeguarding legislation and statutory guidance, including Keeping Children Safe in Education 2025, [Keeping children safe in education from 1 September 2025.pdf](#), the Care Act 2014, [Care Act 2014](#), and the Counter Terrorism and Security Act 2015, [Counter-Terrorism and Security Act - GOV.UK](#).

Richmond and Hillcroft Adult and Community College is committed to safeguarding, protecting and promoting the welfare of all its learners and any children who visit the college with a parent or carer. The college seeks to ensure that the College is a safe environment for all learners to learn, work and socialise, and works within the guidance of the Safeguarding Children Boards and Adult Safeguarding Boards for Richmond, Kingston and surrounding boroughs to implement best practice in the safeguarding of children and Adults at Risk in line with the pan London guidelines. For details of local safeguarding arrangements, see the Kingston and Richmond Safeguarding Children Partnership website,

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/about-krscp/local-safeguarding-arrangements/> and the document: [krscp local safeguarding arrangements.pdf](#).

Although the College is an adult College, a small number of 18-year olds enrol on our provision each year, who are treated as children for funding purposes, and are given additional consideration for safeguarding and wellbeing. The College also offers provision for adult learners who have learning difficulties, disabilities and complex needs who may be unable to care for themselves or to protect themselves from significant harm or exploitation, and also a small number of young adults aged 19-24 with an EHCP¹, who may be considered more vulnerable than other young adults. Otherwise, all children on site are the responsibility of their parents and carers, or organisations or individuals who are hiring college premises or facilities.

The college recognises that learners within the safeguarded groups face the risk of abuse. It is the duty of every member of staff to prevent abuse and to take effective action when abuse is suspected or disclosed. The college also recognises that safeguarding incidents could happen anywhere and at any time and be perpetrated by a range of individuals including staff, other learners and people external to the college including family and friends.

This policy has been developed in accordance with the principles established by the *Children's Acts* of 1989 and 2004, the *Education Act* 2011 and is in line with the Government publication *Working together to Safeguard Children* 2018. It also reflects guidance contained in *Keeping Children Safe in Education* 2025 and the *Care Act* 2014, the *Mental Capacity Act* (MCA) 2005 and the *Counter Terrorism and Security Act* 2015.

Owner:	Vice Principal Curriculum & Quality	Approved by:	Board
Review interval:	Annual	Approved on:	10/11/2025
Date of next review:	Sep 2026	Post to website:	Yes

¹ Education, health and care plan

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COLLEGE COMMITMENT

This section outlines RHACC's commitment to safeguarding, reflecting the College's specific approach to meeting national and local safeguarding expectations.

Abuse is unacceptable in all circumstances. The College is committed to ensuring that all children and vulnerable adults are protected from risk of abuse or risk of radicalisation and extremism. The best defense against abuse is the strength of values incorporated in the College's culture. The College believes that all learners and their children on-site with them are entitled to be treated with dignity, courtesy and respect regardless of their background or of any of the protected characteristics under the Equality Act 2010.

Safety is embedded within good sound practice, and by developing the ability of learners to protect themselves, make their views known and be listened to. All learners should feel safe, secure and feel able to raise any concerns at any time.

The college will report all allegations of abuse to the London Boroughs of Kingston or Richmond Upon Thames or other relevant borough Local Authority Designated Officer (LADO), or Single Point of Access (SPA) if the LADO is not known, or a member of Adult and Community Services team or local safeguarding children's board (LSCB) where an initial fact find indicates further cause for concern. With regards to allegations of suspected radicalisation and extremism, a referral to the CHANNEL services may be made. If the report involves an allegation of a criminal act, a report will also be made to the Police, and the college will fully co-operate with any investigations they carry out. The College will act on all reports of alleged abuse regardless of whether they are recent, are reported to have taken place in the past, have taken place on college premises or within the community.

In the event of an allegation regarding an incident that happened when an individual or an organisation was using the college premises for the purposes of running activities for children, the College will follow the safeguarding policy and procedures. The records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

If staff members have any concerns about a child (as opposed to a child being in immediate danger – see below) they will need to decide what action to take. Where possible, there should be a conversation with the designated safeguarding lead to agree a course of action, although any staff member can make a referral to children's social care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Board.

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

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- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'Honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/ or the police immediately. Anyone can make a referral. Where referrals are not made by the designated safeguarding lead, the designated safeguarding lead should be informed as soon as possible that a referral has been made.

College employees are in a position of trust, and any betrayal of this trust will be viewed most seriously. Therefore, any employee suspected of abuse will be subject to the College's disciplinary procedures. All employees have a duty to report abuse and/ or allegations of abuse immediately where there is a concern that a learner's safety may be endangered, or an initial fact find suggests immediate action needs to be taken, and failure to do so is a serious abdication of responsibility and will result in disciplinary action.

The College retains safeguarding responsibility for learners on off-site placements. Written assurances must be obtained from placement providers regarding their safeguarding arrangements, and these must be reviewed regularly to ensure compliance with statutory guidance.

AIMS OF THE POLICY

Safeguarding encompasses a range of activities aimed at protecting an adult, child or young person's right to live in safety and free from abuse, neglect and exploitation. The Policy aims:

- To prevent abuse, radicalisation and extremism by providing teaching and learner support which establishes a safe environment where learners can learn in confidence, independence and feel listened to;
- To raise awareness of both teaching and business support staff of the need for the safeguarding of children and Adults at Risk and of their responsibilities in identifying and reporting possible cases of abuse, radicalisation and extremism.
- To provide positive adult role models by ensuring that staff behaviour is professional at all times;
- To provide a framework for the development of internal procedures to be followed by members of the College community in cases of suspected abuse;
- To emphasise the need for good levels of communication and information sharing between all members of staff;
- To provide a systematic means of monitoring learners known or thought to be at risk
- To promote understanding and build relationships with other agencies in order to develop multi- agency working and information sharing;
- To ensure the College practices safe recruitment of staff, volunteers and governors,
- To prepare all young learners and vulnerable adults to operate safely within an electronic environment;
- To ensure that learners know that there are Safeguarding Officers whom they can approach if they are worried or in difficulty;
- To provide information in an accessible way to help learners understand the different types of abuse;
- To provide appropriate support to staff, volunteers and governors through supervision and training;
- To assess risk in relation to all College activities, focusing on prevention and minimising risk and putting in place safeguards;
- To ensure staff keep a written record of any injury or incident that caused harm along with any steps taken;

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- To ensure staff and volunteers keep a professional distance and do not share personal information/ email addresses/ telephone numbers with children or young people;
- To equip learners within the safeguarded group with the skills and knowledge to identify positive life choices and to assert their preferences.

Abuse

Abuse is defined as ‘a violation of an individual’s human and civil right by any other person or persons’. Abuse may consist of a single or repeated act and can be carried out by anyone. Whilst abuse can be intentional it does not have to be deliberate, malicious or planned to constitute abuse.

Safeguarding Adults (*Adults at risk*)

An adult at risk is defined as “a person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him/herself, or unable to protect themselves against significant harm or exploitation” (Safeguarding Vulnerable Groups Act 2006). An ‘Adult at Risk’ may therefore be a person who:

- has need for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. (The Care Act 2014)

The Care Act 2014 covers 10 areas of abuse:

1. Physical abuse; the threat or use of force which results in pain or injury or a change in the person’s physical health OR The non – accidental infliction of physical force that results in bodily injury, pain or impairment: Including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions
2. Sexual abuse, including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjecting 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.
3. Psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
4. Financial or material abuse, including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
5. Neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
6. Self-Neglect covers a wide range of behaviours including neglecting to care for personal hygiene, health or surroundings and includes behaviours such as hoarding.
7. Discriminatory abuse; includes forms of harassment, slurs, or similar treatment because of race, gender, gender identity, age, disability sexual orientation or religion.

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8. Institutional abuse, demonstrated by repeated instances of neglect, poor care, management and/or professional practice
9. Domestic Abuse, 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. This includes psychological, physical, sexual, financial, emotional abuse; so called honour-based violence, female genital mutilation and forced marriage. The age range is extended down to 16.
10. Modern Slavery encompasses slavery, human trafficking, forced labour and domesticservitude.

Patterns of abuse vary and include:

Serial abusing - in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse;

Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse; or

Opportunistic abuse such as theft occurring because money or jewellery has been left lying around. Abuse is difficult to assess; many situations may involve a combination of abusive elements.

6 Principles that underpin adult safeguarding

Empowerment – People being supported and encouraged to make their own decisions

Prevention – It is better to take action before harm occurs

Proportionality – The least intrusive response to the risk presented

Protection- Support and representation for those in greatest need

Partnership – Local solutions through services working with their communities

Accountability – Accountability and transparency

The 6 principles aim to encourage practice that puts the person in control and generate a more person-centred set of responses and outcomes.

Safeguarding and the Mental Capacity Act (MCA)

RHACC applies the principles of the Mental Capacity Act (MCA) to ensure learners' rights, autonomy, and best interests are upheld at all times.

The legal framework provided by the MCA is supported by a code of practice. One of the most important terms in the code is 'a person who lacks mental capacity', which means a person who lacks capacity to make a particular decision or to take a particular action for themselves at the time the decision or action needs to be taken.

5 Statutory principles that underpin the legal requirements of the MCA

A person must be assumed to have capacity (always assume capacity until the person shows otherwise)

A person must be helped to make decisions

A person must be allowed to make an unwise decision

Actions undertaken for or on behalf of a person must be done in their best interests

Actions or decisions made on behalf of a person must be the least restrictive option

4 Tests that someone has capacity is that the person is able to:

- Understand information about the decision to be made
- Retain that information in their mind
- Use that information as part of the decision – making process
- Communicate their decision

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Safeguarding children

Child

A 'child' is defined as a person aged up to 18. 'Keeping Children Safe in Education' 2025 recognises the additional vulnerabilities of 'looked after children' and care leavers. The Children Act 2004 also covers adults with a disability up to the age of 25.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical 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

Abuse, Neglect or Exploitation of a child

Somebody may abuse, neglect or exploitation a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

The areas of abuse identified above as relevant in the safeguarding of adults at risk also apply to children. However, *Keeping Children Safe in Education 2025 Annex B* highlights additional safeguarding issues which staff should be aware of when ensuring the wider safety and wellbeing of a child:

- Child abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- Child abduction – unauthorized removal or retention of a minor from a parent or person with legal responsibility.
- Children and the court system – where children are required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.
- Children missing from education – all staff should be alert where children go missing repeatedly from education, as it can be a warning sign of a range of safeguarding issues. Behaviours linked to issues such as, drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.
- Children with family members in prison – these children are at risk of poor outcomes, and require additional support

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- Child criminal exploitation and child sexual exploitation – signs might include children appearing with unexplained money or new possessions
- Serious violence including County lines – where children and vulnerable adults are exploited to move, store and sell drugs and money
- Modern slavery – human trafficking and slavery, servitude and forced or compulsory labour
- Cybercrime – criminal activity committed using computers and the internet
- Domestic abuse – includes a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour by someone who is personally connected to the child. Homelessness – children’s services are the lead agency where a child reports that they are homeless, but referrals should be made according to the specific circumstances.
- So-called honour-based abuse – includes FGM, forced marriage and breast ironing, committed in the context of “preserving honour” of the family or community
- FGM – partial or total removal of external female genitalia or other injury to the female genital organs. Illegal in the UK (see below).
- Forced marriage – illegal in England and Wales.
- Prevent Duty – children are vulnerable to extremist ideology and radicalisation. Colleges have a duty to have due regard to the need to prevent people from being drawn into terrorism (see below). Peer on peer/ child on child abuse – can include bullying, cyberbullying, physical abuse, sexual harassment, sexual violence, sexting, hazing. Alleged perpetrators may try to dismiss this as “banter”. Extremism is now defined as the promotion or advancement of an ideology based on violence, hatred or intolerance. Further Education colleges must conduct contextual risk assessments to identify local threats and vulnerabilities. Staff training is regularly strengthened at RHACC through ongoing training and review to ensure all staff understand the revised Prevent Duty guidance, <https://www.gov.uk/government/publications/prevent-duty-guidance>, and are equipped to identify and respond to signs of radicalisation and peer-on-peer abuse.
- Sexual violence and sexual harassment between children in schools and colleges – Sexual violence refers to offences under the Sexual Offences Act 2003. Sexual harassment refers to unwanted conduct of a sexual nature, online, offline, inside and outside the college environment.
- Upskirting – the Voyeurism (Offences) Act 2019 is commonly known as the Upskirting Act; upskirting refers to taking a picture under someone’s clothing without their permission and/ or knowledge.

The college’s procedures and guidelines will take account of the above issues, and provide clear guidance to any staff dealing with children and young people about their duties regarding confidentiality in the use of digital technology.

Female Genital Mutilation (FGM) Mandatory Reporting Duty

The duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015).

The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

There are NO circumstances in which staff should be examining a learner or child.

For the purposes of the duty, the relevant age is the girl’s age at the time of the disclosure/ identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

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The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

The duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. In these cases, you should follow the college's safeguarding procedures.

Children with special educational needs, disabilities or health issues

1. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognizing abuse, neglect and exploitation in this group of children. These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
 - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
 - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
 - communication barriers and difficulties in managing or reporting these challenges
 - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
2. The College will ensure that any reports of abuse involving children with SEND will prompt close coordination between the designated safeguarding lead (or the deputy) and the Head of Foundation Learning department.
3. The college will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communications in place. ²

1. ² For further information:

- [SEND Code of Practice January 2015.pdf](#), and
 - [supporting-pupils-at-school-with-medical-conditions.pdf](#).
 - And from specialist organisations such as:
 - The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](#)
 - [Learning Disability - Down syndrome - Williams syndrome | Mencap](#)-
 - [NSPCC | The UK children's charity | NSPCC](#)
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Children who are lesbian, gay, bisexual, or gender questioning

1. A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.
2. Caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder³.
3. When supporting a gender questioning child, the College takes a cautious and evidence-informed approach. This includes considering the broad range of the child's individual needs in partnership with their parents or carers (except in the rare cases where involving parents would pose a significant risk of harm). Clinical advice should be considered, and wider vulnerabilities such as the risk of bullying must be addressed.
4. Staff must be aware of the Department for Education's final guidance on gender questioning children and ensure that any support provided is consistent with statutory expectations. Staff should also be trained to understand the complex vulnerabilities that may affect gender questioning children, including mental health challenges and neurodiversity.
5. Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff work to reduce these barriers and create a culture where all children feel safe to speak out or share concerns.

Online Safety

RHACC staff are trained to identify, manage, and report online safety concerns in accordance with statutory and college-specific procedures.

The breadth of issues classified within online safety is considerable and continues to evolve. These risks can be categorised into three main areas:

- content: being exposed to illegal, inappropriate, or harmful material, such as pornography, fake news, racist or radical and extremist views, as well as misinformation, disinformation, conspiracy theories, and AI-generated content.
- contact: being subjected to harmful online interaction with other users, such as commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; such as making, sending and receiving explicit images, or online bullying.

All RHACC staff are trained to identify and respond to emerging online threats, including those involving generative AI and synthetic media. (See Appendix 2 of Procedures for useful links regarding online safety.)

Government Counter Terrorism Strategy (CONTEST 2015), and the Prevent Duty

The following section summarises RHACC's approach to meeting the Prevent Duty and related requirements under the Counter Terrorism and Security Act 2015.

The Prevent Duty is part of the College's wider safeguarding obligations. The Designated Safeguarding Lead (DSL), Deputy DSL, and senior leaders must be familiar with the revised **Prevent Duty guidance for England and Wales**, particularly paragraphs 141–210, which focus specifically on education. The guidance is structured around three key themes: leadership and partnership, capabilities, and reducing permissive environments.

³ Cass review; [\[ARCHIVED CONTENT\] Cass Review – Independent Review of Gender Identity Services for Children and Young People](#)

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The college's Designated Safeguarding Lead and the Deputy should be aware of local procedures for making a Prevent referral.

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the college safeguarding approach.

Extremism is now defined as the promotion or advancement of ideologies based on violence, hatred, or intolerance. This includes vocal or active opposition to fundamental British values such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Terrorism: is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Further Education colleges must conduct contextual risk assessments to identify local threats and vulnerabilities. These assessments should inform the College's safeguarding strategy and staff training. Staff training is regularly strengthened at RHACC through ongoing training and review to ensure all staff understand the updated Prevent Duty guidance and are equipped to identify and respond to signs of radicalisation, extremism, and associated safeguarding concerns.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) [making a Prevent referral](#).

CONTEST is the UK's government strategy which aims to reduce the risk to the UK and its interests overseas from terrorism, so that people can go about their daily lives freely with confidence. There are 4 main elements:

Martyn's Law and Protective Security

The Terrorism (Protection of Premises) Act 2025, commonly known as Martyn's Law, was enacted to improve protective security and preparedness across publicly accessible premises, including education settings. Named in honour of Martyn Hett, a victim of the 2017 Manchester Arena attack, the law requires organisations to assess and mitigate risks associated with potential terrorist incidents.

Martyn's Law introduces a tiered approach based on the number of individuals expected on site. RHACC falls under the standard tier, which applies to education premises regardless of whether more than 800 individuals are present. As such, RHACC is committed to complying with the legislation by implementing proportionate security measures, conducting risk assessments, and ensuring staff are aware of emergency protocols.

Although the Act includes a 24-month implementation period, RHACC will proactively review its safeguarding and emergency planning procedures to align with the requirements of Martyn's Law and ensure the safety of learners, staff, and visitors.

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Pursue	lies within the realm of the police and security services. It is concerned with the apprehension and arrest of any persons suspected of being engaged in the planning, preparation or commission of a terrorist act.
Prevent	is concerned with working with partners to reduce support for terrorism of all kinds, challenge extremists whose views are shared by terrorist organisations and challenging and isolating extremists operating on the internet.
Protect	aims to strengthen our protection against a terrorist attack and reduce our vulnerability to such attacks. This involves managing the risks to crowded places and the safeguarding of hazardous materials.
Prepare	seeks to mitigate the impact of a terrorist attack where that attack cannot be stopped. This includes work to bring a terrorist attack to an end and to increase our resilience so we can recover from its aftermath.

All schools and colleges are required, under Section 26 of the Counterterrorism and Security Act 2015, to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism” in the exercise of their functions. This is referred to as the Prevent duty.

The Prevent duty is part of the colleges’ wider safeguarding obligations. The Designated Safeguarding Lead should ensure that the Deputy, and other senior leaders are familiar with the revised [Prevent duty guidance: for England and Wales](#), particularly paragraphs 141-210, which focus specifically on education. The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.

Vulnerability to Radicalisation

All staff have a responsibility to take notice of patterns of behaviour that suggest a person might be engaged in an ideology, is intent in causing harm and/ or capable of committing violent acts.

There are a number of behaviours and other indicators that may indicate a vulnerability to radicalisation and extremism.

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Dimension	Definition/ Factors	Potential Indicators
Engagement	<p>Engagement factors are sometimes referred to as psychological hooks. These could include the needs of a person, their susceptibilities, their motivations and influences.</p> <p>Engagement factors can also include:</p> <ul style="list-style-type: none"> • Feelings of grievance or injustice • Feeling under threat • A need for identity, meaning or belonging • A desire for status • A desire for excitement or adventure • A need to dominate and control others • A desire for political or moral change • Opportunistic involvement • Family or friends involvement in extremism • Mental health difficulties 	<ul style="list-style-type: none"> • spending increasing time in the company of other suspected extremists; • changing their style of dress or personal appearance to accord with the group; • their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; • loss of interest in other friends and activities not associated with the extremist ideology, group or cause; • possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); • attempts to recruit others to the group/cause/ideology; or • communications with others that suggest • identification with a group/cause/ideology.
Intent	<p>Intent factors are those that show a person is ready to use violence to promote their views or achieve their aims.</p>	<ul style="list-style-type: none"> • clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills • using insulting or derogatory names or labels for another group • speaking about the imminence of harm from the other group and the importance of action now • expressing attitudes that justify offending on behalf of the group, cause or ideology • condoning or supporting violence or harm towards others; or

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Capability	To have capability to cause harm requires skills resources and networks to be successful.	<ul style="list-style-type: none"> • having a history of violence • being criminally versatile and using criminal • networks to support extremist goals • having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or • having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).
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The examples above are not exhaustive and vulnerability may manifest in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

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Targeted Prevention

Targeted Prevention Strategies include:

- Safeguarding and Prevent action plan (Appendix 11b in Procedures)
- Safer recruitment processes – Please refer to safer recruitment policy and procedures (R:\Human Resources\Safer Recruitment)
- DBS renewal programme – Please refer to DBS matrix for renewal intervals (Appendix 10 in Procedures)
- Termly single central record sign off by the Lead Governor for Safeguarding, the Designated Safeguarding Lead, and the HR Manager.
- Monthly monitoring of DBS checks and risk assessments and training at the Safeguarding group.

Multi-agency working

Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance *Working Together to Safeguard Children*.

Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.

ROLES AND RESPONSIBILITIES

The **Board** will ensure that:

- the College has a safeguarding policy and procedures in place that are in accordance with the appropriate Local Safeguarding Boards and locally agreed inter-agency procedures, and the policy is made available to parents/ carers on request;
- the College has procedures for dealing with allegations of abuse against fellow learners, staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures;
- they remedy, without delay, any deficiencies or weaknesses regarding safeguarding arrangements;
- a governor is nominated to be responsible for safeguarding who will provide an overview and scrutiny and take action in the event of allegations of abuse being made against the Principal;
- they review their policy annually and following any statutory change (e.g., RSHE or gender guidance), and provide information to the appropriate sub committees of the Local Safeguarding Board as and when requested;

The **Principal** will be responsible for ensuring that:

- there is a Lead Designated Safeguarding person on the Senior Management Team (the Vice Principal Curriculum & Quality) and that sufficient designated safeguarding staff are available;
- the safeguarding policy is updated and reviewed annually and following any statutory change (e.g., RSHE or gender guidance);
- the College has procedures to fully implement the policy adopted by the Board;
- sufficient resources and time are allocated to enable the designated person/s and other staff to discharge their responsibilities;
- the Health & Safety Committee review and approve procedures annually and following any statutory change (e.g., RSHE or gender guidance) to enable the College to comply with the policy

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adopted by the Board

- the Health & Safety Committee will monitor the College's compliance with policy;
- the Health & Safety Committee makes regular reports to the Board;
- the Health & Safety Committee establishes a Safeguarding sub-committee comprising the safeguarding staff and chaired by the College Lead Designated Safeguarding Person to make recommendations about policy and procedures and to monitor safeguarding reports;
- the Health & Safety Committee review and if necessary act upon reports received from the safeguarding committee;

The **Vice Principal Curriculum & Quality/ Designated Safeguarding Lead** will be responsible for ensuring that:

- the Principal is provided with summary information about Safeguarding alerts;
- the Principal is immediately informed of any serious Safeguarding alerts which require a Safeguarding report or referral to be made to external agencies, or to the Police for suspected criminal acts;
- appropriately trained safeguarding staff are in place;
- all staff undertake appropriate safeguarding training;
- there is an ethos whereby all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to safeguarding, and such concerns are addressed sensitively and effectively in a timely manner;
- where services or activities are provided on the College premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding and liaises with the College on these matters where appropriate;
- the procedures approved by the Health & Safety Committee are fully implemented;
- cases of suspected abuse or allegations are referred to the relevant investigating agencies as appropriate;
- learners are aware of the Safeguarding procedures, and appropriate content on keeping safe and wellbeing are incorporated into courses as relevant to the learner group;
- all staff have access to and understand the College's Safeguarding and Prevent Policy;
- parents, guardians or named responsible adults are made aware of the policy which alerts them to the fact that referrals may be made and the role of the establishment in this to avoid conflict later

The **Head of HR** will be responsible for ensuring that:

- the College operates safer recruitment practices which align with the guidance in *Keeping Children Safe in Education*, and makes sure that all appropriate checks are carried out on staff and volunteers who work with children and Adults at Risk;
- the college staff induction process covers how to keep safe and how to use the Safeguarding procedures;

The **College Deputy Designated Safeguarding Lead** will:

- be a member of the Senior Management Team;
- work with the Designated Lead to act as a source of support, advice and expertise on matters of learner safety and safeguarding within the educational establishment;
- deputise for the Designated Lead in their absence.

Safeguarding Officers will:

- recognise how to identify signs of abuse and when it is appropriate to make a referral;
- keep detailed, accurate and secure written records of alerts and/ or concerns;
- undertake investigations as directed by the Lead Designated Safeguarding Person
- obtain access to resources and attend any relevant or refresher training courses at least every two years;

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- as part of the Safeguarding Team, plan and implement training and disseminate information for children and Adults at Risk on staying safe at the College.
- support or arrange support for children or adults at risk who have been abused or are at risk of abuse

All staff and volunteers will:

- work in an open environment, where possible avoiding private and unobserved situations;
- treat all learners fairly with dignity and respect;
- not share personal information and personal e-mail addresses/ Facebook friends/ personal mobile;
- keep a written record of any alerts or incidents along with any steps taken;
- fully comply with the College's policies and procedures, including advising their line manager of any alerts or incidents;
- attend appropriate training;
- be alert and vigilant to indicators of abuse;
- report all concerns of possible indicators of abuse to a College Safeguarding Officer.

How to Contact a Safeguarding Officer

The College Safeguarding Officers can be contacted at any time from 09.00-17.30 on weekdays. The contact details for the safeguarding team are displayed in Reception areas at Parkshot and Hillcroft and also on notice boards in public areas throughout the college. Details are also on the College website.

The College operates a Duty Manager system (details displayed at reception and on the website) whereby a senior manager is contactable until 20.00 Monday to Thursday in term time to deal with serious Safeguarding and Health and Safety issues.

Otherwise, if staff members have a safeguarding concern, they should call the Police if there is an immediate danger, but otherwise should complete a Record of Concern form, SG1 [My RHACC - Safeguarding Children and Adult Policy and Procedures - All Documents](#), and ensure this is sent to safeguarding@rhacc.ac.uk or handed in to Reception in a sealed envelope addressed to Safeguarding Team. Safeguarding Officers can be contacted to seek advice and discuss concerns. The anonymity of anyone making an alert cannot be guaranteed as the information may be needed as part of a disciplinary or criminal investigation.

Referral and Reporting Procedure

If the alleged abuser is a member of RHACC staff, the staff member to whom the disclosure is made should immediately contact the Vice Principal Curriculum & Quality (C&Q) or Head of HR. On the same day that a disclosure is made the employee making the alert should carry out the functions below:

- Write a factual and chronological account of what was heard and learnt (use Safeguarding Record of Concern SG1 within the Safeguarding procedures, Appendix 5 or click on the following link: [My RHACC - Safeguarding Children and Adult Policy and Procedures - All Documents](#))
- Note what the person making the disclosure said, recording the actual words and phrases
- Describe the circumstances in which the disclosure came about
- Note the setting and anyone else who was there at the time
- Ensure information is factual. Any third party opinions or information should be clearly identified as such
- Print your name and sign and date the report, noting the time and location.
- Send the Record of Concern, SG1, to safeguarding@rhacc.ac.uk

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Allegations against senior management staff and members of governing body

If the alleged abuser is a Vice Principal, Principal, or a member of the Governing Body, the staff member receiving the disclosure should immediately report concerns to the appropriate contact within the Local Authority:

If the child is at risk, contact:

- For Richmond and Kingston residents: report your concern using the referral form <https://docs.google.com/forms/d/e/1FAIpQLSdYVca4qbvFJS71sD2PzYr8mhyot9GrOdzHUUYOmJeM7uCKA/viewform>
- Alternatively email: LADO@achievingforchildren.org.uk or phone: 020 8891 7370 .

If a vulnerable adult is at risk, contact:

For Richmond residents:

Contact information

- Email: adultsocialcare@richmond.gov.uk
- Telephone (standard hours): 020 8891 7971
- SMS Phone: 07860 034792
- 07860 space 034792
- Adults Emergency Duty Team (out of hours): 020 8744 2442

Other contact methods

- Online enquiry form: https://preview.richmond.gov.uk/services/adult_social_care/contact_adult_social_care
- Online self-referral form: https://www.richmond.gov.uk/services/adult_social_care/make_a_referral
- Online professional referral form: https://www.richmond.gov.uk/services/adult_social_care/make_a_referral

For Kingston residents:

Contact details

- Phone: 020 8547 5005
- Email: adults@kingston.gov.uk
- Address: Adult Social Care, Guildhall 2, Kingston, KT1 1EU
- Out of hours/Emergency: 020 8770 5005 or 020 8547 5800
- For immediate mental health crisis: Call the Kingston mental health crisis line on 0800 028 8000

Holding and sharing information

Recording, holding, using and sharing information effectively is critical important. Therefore, the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the college, and with other colleges, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UKGDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

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CONFIDENTIALITY

Information about abuse must never be withheld intentionally (deliberately withholding information may lead to disciplinary action) as failure to disclose may have an influence on the future safety of an individual.

Disclosures and concerns should not be treated as confidential. Individuals who have made a disclosure should be informed of the next steps that will be taken and should be assured of discretion.

Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information either as a legal obligation or for a legitimate interest, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

If a learner lacks the capacity to consent (as prescribed in current legislation), the College will report the alleged abuse immediately in order to act in the best interests of the individual.

It is important that governing bodies are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.