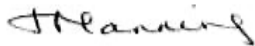




Safeguarding Policy - Adults at Risk

Policy Ref: TMP2v9

This policy will not discriminate either directly or indirectly against any individual on grounds of sex, race, ethnicity or national origin, gender, sexual orientation, marital status, religion or belief, age, disability, socioeconomic status, offending background or any other personal characteristic.

	Name	Title	Signature	Date
Prepared by	Jackie Manning	Principal		July 2026
	Kim Pulman	Director of Pastoral Care		July 2026
Approved by	Martin Heaton	CEO		July 2026

Does this Policy require publishing on the College Website? **Yes**

Does this Policy require approval by Board of Governors? **Yes**

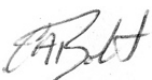
Safeguarding Policy - Adults at Risk

Policy Ref: TMP2v9

Record of Changes

Version	Issue Date	Changes	Initials
v1	July 2019	Initial issue	JM/CF
v2	July 2020	General procedural review, references updated, formatting changes	JM/CF
v3	July 2021	Annual review, references checked and updated	JM/CF
v4	July 2022	Annual review, references checked and updated	JM/CF
v5	July 2023	Annual review, references checked and updated	JM/CF
v6	April 2024	Flowchart appended, minor changes	JM/CF
v7	July 2024	Annual review, references checked and updated	JM/CF
v8	July 2025	Annual review, references checked and updated	JM/CF
v9	July 2026	Annual review: Care Act/statutory guidance; Making Safeguarding Personal; Mental Capacity/consent; abuse categories; SEND; Prevent; online harms/AI; Databridge recording; PIPOt/staff concerns; local referral routes; adult safeguarding flow.	KP/JM

Board of Governors Approval History

Version	Approved by	Signature	Date
v4	Dominic Kohl, Chairman of the Board of Governors		July 2022
v5	Andrew Samson, Board of Governors		Oct 2023
v8	Claire Bolt, Board of Governors		May 2026

Date of Next Policy Review: July 2027

Definition

Throughout this policy document **TMP Studios CIC** is referred to as 'TMP College'.

Scope

This policy applies to all staff, governors, volunteers, contractors, agency staff, external professionals and others working in or on behalf of TMP College. It applies specifically to safeguarding learners aged 18 and over who meet, or may meet, the Care Act 2014 adult safeguarding criteria. Learners under 18 are safeguarded under the College Safeguarding and Child Protection Policy.

Adult at Risk Statement

TMP College is committed to safeguarding adults at risk and promoting their welfare and expects all staff, governors, volunteers and visitors to share this commitment and maintain a vigilant and safe environment.

Everyone has a responsibility to act, without delay, to protect adults at risk by reporting anything that might suggest an adult at risk is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. TMP College seeks to work in partnership with families and other agencies to improve the outcomes for adults at risk who are vulnerable or in need.

This policy includes referrals to Channel¹ in compliance with the Prevent² Duty.

TMP College further reinforces our duty of care to all learners, irrespective of age or vulnerability, within all relevant training, guidance, policies and procedures, deriving from:

- Common law duty of care/in loco parentis
- Statutory duty of care and sector specific guidance and legislation
- Duty arising from the contract of employment

Definitions

The Care Act 2014³ sets a clear framework for how local authorities should protect adults at risk of abuse or neglect. The Act places a duty on local authorities to make enquiries, or cause others to do so, if it believes that an adult:

- has needs for care and support (whether or not the authority is meeting those needs) and is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself or herself against the abuse or the neglect or the risk of it.

¹ <https://www.gov.uk/government/publications/channel-guidance>

² <https://homeofficemedia.blog.gov.uk/2019/11/05/factsheet-prevent-and-channel/>

³ <https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets>

Adult safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. Under section 42 of the Care Act 2014, safeguarding duties apply where an adult has needs for care and support, is experiencing or is at risk of abuse or neglect, and because of those needs is unable to protect themselves from the abuse, neglect or risk of it.

Policy Aims

To ensure TMP College takes appropriate action, in a timely manner, to safeguard and promote the welfare of all adults at risk

To ensure responsibilities and procedures are fully understood and that everyone can recognise signs and indicators of abuse or neglect and respond to them appropriately.

To ensure that TMP College's practice meets local and national guidance and all statutory requirements are in place.

Key Principles

- ● Safeguarding will be person-centred and outcome-focused. The adult's wellbeing, wishes, feelings, desired outcomes and right to make choices will be central to decision-making, in line with Making Safeguarding Personal.
- All staff should maintain an attitude of "it could happen here" where safeguarding is concerned.
- Adults at risk should be listened to and their views and wishes should inform any assessment and provision for them. Staff should always act in the interests of the adult at risk, in order to protect them.
- TMP College recognises that scrutiny, challenge and supervision are key to safeguarding adults at risk.
- ● TMP College will work with the adult and relevant agencies to provide timely, proportionate support, prevention and early intervention where concerns are emerging, without waiting for risk to escalate.
- ● Staff must identify emerging safeguarding risks, remain professionally curious, share relevant information and seek advice from the safeguarding team where an adult may require additional support or protection.
- ● Staff must understand how to raise an adult safeguarding concern with the relevant Local Authority where the Care Act section 42 criteria may be met, and the role they may be asked to play in any safeguarding enquiry.
- All staff have responsibility to report their concerns about an adult at risk **without delay** to TMP College's Safeguarding Lead (or deputy). Whilst the Safeguarding Lead (or deputy) will normally make referrals to Adult Services, **anyone** can refer their concerns to Adult Services directly in emergencies or if they feel they need to do so.
- ● Staff and DSLs must use professional challenge and the relevant Local Authority / Safeguarding Adults Board escalation process where they believe risks remain unmanaged or the adult's safeguarding needs are not being adequately addressed.

- TMP College will work in partnership with other agencies to promote the welfare of adults at risk and protect them from harm, including the need to share information about them in order to safeguard them.
- TMP College will work with other agencies to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way.
- TMP College will follow the Local Safeguarding Adults Board procedures and provide them with information as required.
- Adults at risk have a right to learn ways to keep themselves safe from harm and exploitation.
- All staff will work to the 6 Principles of Safeguarding as defined by The Care Act 2014:
 - Accountability
 - Empowerment
 - Partnership
 - Prevention
 - Proportionality
 - Protection

Legislation and Guidance

- Care Act 2014, particularly sections 42-46
- Care and Support Statutory Guidance, Chapter 14: Safeguarding (current edition)
- Mental Capacity Act 2005 and Mental Capacity Act Code of Practice
- Human Rights Act 1998
- Domestic Abuse Act 2021
- Modern Slavery Act 2015
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR

The Counter-Terrorism and Security Act 2015 ⁴places a duty upon local authorities and educational providers to *'have due regard to the need to prevent people from being drawn into terrorism'* (CTSA 2015). 'The fundamental aims of Prevent, as part of the revised 2018 Contest Strategy are, "to safeguard vulnerable people to stop them becoming terrorists or supporting terrorism." (Work Based Learners and the Prevent Statutory Duty 2018⁵).

TMP College will have regard to the current Prevent duty guidance for England and Wales (2023, updated 2024), including the education sector requirements on leadership, risk assessment, partnership, staff capability and IT policies.

- risk assessment,
- working in partnership,
- staff training
- IT policies.

⁴ <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>

⁵ <https://www.gov.uk/government/publications/work-based-learners-and-the-prevent-statutory-duty>

TMP College will ensure that staff are aware of the indicators of extremism and radicalisation and know how to respond in keeping with local and national guidance. Staff will use their judgement in identifying adults who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme. Equally, adults at risk will be made aware of the risks and support available to them. We will ensure that adults at risk are safe from terrorist and extremist material when accessing the internet in TMP College. The Government has developed an 'educate against hate' website⁶ providing information and resources for colleges and parents to support them to recognise and address extremism and radicalisation in young and/or vulnerable people.

The Teaching Standards (DfE 2013 updated Dec 2021)⁷ also requires all tutors to 'uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside TMP College, including:

- treating learners with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a tutor's professional position
- having regard for the need to safeguard learners' wellbeing, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others

TMP College will also take account of additional guidance and legislation including:

- The Equality Act 2010⁸
- Special educational needs and disability code of practice: 0 to 25 years: Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities (DfE 2014, updated 2020)⁹
- Criminal Exploitation of children and vulnerable adults: County Lines Guidance (DFE, 2017, updated 2024)¹⁰
- Information sharing: advice for safeguarding practitioners (DfE, updated 2024), where relevant
- Prevent duty guidance: England and Wales (Home Office, 2023; updated 2024)

Types of Abuse and Neglect

Abuse may be a single act or repeated acts, intentional or unintentional, and may occur in any setting, including online. Staff must also be alert to exploitation, cuckooing, coercive control, mate crime, scams, hate crime and abuse by people in positions of trust. Self-neglect includes neglecting personal hygiene, health or surroundings and may include hoarding.

⁶ <https://educateagainsthate.com/>

⁷ <https://www.gov.uk/government/publications/teachers-standards>

⁸ <https://www.gov.uk/guidance/equality-act-2010-guidance>

⁹ <https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>

¹⁰ <https://www.gov.uk/government/collections/county-lines-criminal-exploitation-of-children-and-vulnerable-adults>

The following are examples of types of abuse:

- Physical abuse
- Domestic abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of omission
- Self-neglect

Communicating with parents and visitors

TMP College is committed to the principles of safeguarding where a person centred approach is fundamental to safeguarding and promoting the welfare of every adult at risk. An adult at risk centred approach means keeping them in focus when making decisions about their lives and working in partnership with them and their families.

The names and photographs of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead are displayed in each centre.

Roles and responsibilities at TMP College (as at September 2026)

Principal: Jackie Manning

Senior Designated Safeguarding Leads: Kim Pulman, Joanne Wale, Jackie Manning, Caroline Fell and Andrew Dickson

Wider DSL Team: Tayla Cottom, Katie McKnight, Alex Wormald and Claire Brant

The nominated Safeguarding Governor is: Joanne Dockerty

The Board should ensure that:

- TMP College meets the statutory responsibilities set out in relevant legislation and local guidance
- This policy is reviewed at least annually by the Board
- There is a named Designated Safeguarding Lead who is a member of TMP College's Senior Leadership Team. There are colleagues trained to provide cover for the role.
- TMP College has procedures in keeping with the local Safeguarding Adults Board (SAB) for dealing with any allegations made against any adult working within the College.
- There is a nominated Board member with safeguarding responsibility, who is the case manager for managing any allegations against the Principal.
- There is a nominated safeguarding Board member to liaise with the Designated Safeguarding Lead and to champion safeguarding on behalf of the board.
- TMP College follows safer recruitment procedures, including the statutory pre-employment checks on all staff. The Board and safeguarding governor together with the Principal review TMP College's single central record.
- TMP College itself is a safe environment where the views of adults at risk and families are listened to and where adults at risk are taught about safeguarding and how to keep themselves safe, including on the internet or when using new technology. Any complaints about services lead to improvements in practice.
- TMP College will ensure there are appropriate filters and monitoring systems in place in respect of internet use and encourage safe and responsible use of new technologies.
- TMP College scrutinises the impact of its training strategy so that all staff, including temporary staff and volunteers, are aware of TMP College's safeguarding policies and procedures. All staff must have safeguarding training which is regularly updated. The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads undertake training in keeping with statutory training requirements.
- The governors are given guidance to support them to ensure TMP College meets its statutory safeguarding requirements.
- All safeguarding practices are quality assured by the Designated Safeguarding Lead, including the auditing of safeguarding records and the supervision of the Deputy Safeguarding Lead.

The Board are accountable for ensuring TMP College has effective policies and procedures in line with local and national guidance, and for monitoring TMP College's compliance with them. The Board do not have a role in dealing with individual adult at risk cases or the right to know the detail of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff or investigating a complaint brought to their attention).

The Principal will ensure that:

- TMP College works with an appropriate agency to carry out DBS checks and will update the Single Central Record. Ensure the safer recruitment practices are followed in line with TMP College's Recruitment and Selection Policy and Procedures.
- Job descriptions and person specifications for all roles make specific reference to adult at risk protection and safeguarding.
- There is a listening culture within TMP College where both staff and adults at risk are able to raise concerns about poor or unsafe practices.
- Referrals are made to the Disclosure and Barring Service as appropriate.
- They liaise with the Local Authority Designated Officer where an allegation is made against a member of staff.

The **Designated Safeguarding Lead** has a job description in keeping with safeguarding requirements and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the Designated Safeguarding Lead who have undertaken the same training.

The **Designated Safeguarding Lead** will quality assure TMP College's adult at risk practices including the auditing of safeguarding records and the supervision of the Safeguarding Deputy to ensure that actions and decisions are reviewed appropriately and that staff's emotional needs are met.

The latest safeguarding legislation set out the broad areas of responsibility for the **Designated Safeguarding Lead**, which include the following:

- Refer cases of suspected abuse to the Local Authority Adult Services as required;
- Support staff who make referrals to Adult Services;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to an adult at risk to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required
- Work with Others
- Liaise with the Principal to inform him or her of issues especially ongoing serious safeguarding concerns and police investigations;
- Liaise with staff (especially support staff, IT technicians and the named person with oversight of SEN in TMP College) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Act as a source of support, advice and expertise for staff.
- Undertake Prevent awareness training.

The **Designated Safeguarding Lead** (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read

and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so that they:

- Understand the assessment process for providing support, including Adult Services' referral arrangements.
- Ensure each member of staff has access to and understands TMP College's Adult at risk policy and procedures, especially new and part time staff;
- Are alert to the specific needs of adults at risk in general and those with special educational needs and young carers;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018¹¹ and the General Data Protection Regulation¹²;
- Understand the importance of information sharing, both within TMP College, and with our three safeguarding partners, other agencies, organisations and practitioners;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support TMP College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting adults at risk from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up-to-date capability required to keep adults at risk safe whilst they are online at TMP College;
- Can recognise the additional risks that adults with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND adults to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to adults at risk and taking account of their wishes and feelings, among all staff, and any measures TMP College may put in place to protect them.

The **Designated Safeguarding Lead** should also

- Ensure TMP College's Adult at Risk policies are known, understood and used appropriately;
- Ensure TMP College's Adult at Risk policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure TMP College's Adult at Risk policy is available publicly and parents/ carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of TMP College in this; and
- Link with the local LSAB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Where adults at risk leave, the **Designated Safeguarding Lead** shall ensure their adult at risk protection file is transferred to the new college upon request. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

¹¹ <https://ico.org.uk/for-organisations/data-protection-act-2018/>

¹² <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

Receiving colleges should ensure key staff such as Designated Safeguarding Leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the adult at risk protection file, the **Designated Safeguarding Lead** should also consider if it would be appropriate to share any information with the new college in advance of an adult at risk leaving. For example, information that would allow the new college to continue supporting victims of abuse and have that support in place for when the adult at risk arrives.

During term time the **Designated Safeguarding Lead** (or a deputy) will be available (during College hours) for staff in TMP College to discuss any safeguarding concerns.

The **Designated Safeguarding Lead** will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

The **Principal** will normally be informed of any allegations against staff and will ensure appropriate referrals to the Disclosure and Barring Service or Teaching Regulation Agency are made.

In addition to the above the **Designated Safeguarding Lead** is also expected to ensure that:

- A training log is kept of safeguarding training including the names of those attending. All staff must have regular training and updates.
- TMP College attends and contributes to multi-agency meetings, ensuring actions are completed in a timely manner.
- TMP College escalates its concerns with other agencies when an adult at risk's needs are not being met following the Local Safeguarding Board Escalation and Resolution Policy.
- The Safeguarding Lead (and deputy) have received appropriate training; that all referrals made are quality assured and the supervision is provided to the Deputy Safeguarding Lead.

All staff (and volunteers) should:

- Contribute to ensuring learners learn in a safe environment.
- Recognise that any adult at risk will benefit from timely support, but should be particularly alert to the potential need for an adult at risk who:
 - is disabled and has specific additional needs
 - has special educational needs
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - is misusing drugs or alcohol themselves
 - is at risk of modern slavery, trafficking or exploitation
 - is showing early signs of abuse and/or neglect
 - is at risk of being radicalised or exploited
- Report any concerns about an adult at risk's welfare without delay to:
 - the Designated Safeguarding Lead
 - the Deputy Designated Safeguarding Lead
 - or in their absence a senior member of staff.
- Understand that any member of staff can make a referral to Adult Services should that be required, informing the Safeguarding Lead (or deputy) of any action taken.

- Report any concerns without delay about the behaviour of staff towards an adult at risk to the Principal, Designated Safeguarding Lead or the Chair.
- Staff and DSLs must use professional challenge and the relevant Local Authority / Safeguarding Adults Board escalation process where they believe risks remain unmanaged or the adult's safeguarding needs are not being adequately addressed.
- Follow all TMP College's policies including this policy and TMP College's Code of Conduct.
- Be aware safeguarding issues can manifest themselves via adult-on-adult / peer abuse
- Understand that some adults at risk, including those with Special Educational Needs, may be more vulnerable to abuse.
- Recognise that Adults at risk with special educational needs (SEN) and disabilities can face additional safeguarding challenges. This can include:
 - o staff must avoid diagnostic overshadowing and must not assume that changes in behaviour, mood, attendance, presentation, injury or communication are explained by a learner's disability, diagnosis or additional needs without further exploration;
 - adults at risk with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
 - o communication barriers, including difficulties expressing concerns, understanding risk or being believed. Staff must use appropriate communication methods and reasonable adjustments to support disclosure and participation.
- Have access to TMP College's Code of Conduct and Whistleblowing policy.

Safeguarding Framework

In addition to this policy, TMP College has procedures and/or policies in relation to other areas of safeguarding, including:

- attendance
- anti-bullying including cyber bullying
- code of conduct for staff (guidance on safer working practices)
- data protection
- First Aid
- safe recruitment practices
- safeguarding for adults at risk
- Single Equality Scheme and Action Plan
- whistleblowing
- photography and filming policy

Procedures for reporting adult at risk protection or adult at risk welfare concerns

All safeguarding concerns must be reported without delay to a Senior DSL or member of the wider DSL team and recorded promptly on Databridge. Urgent concerns must be reported directly and must not be left solely as an electronic record. Where an adult is in immediate danger or requires urgent medical assistance, staff must call 999 and inform the safeguarding team as soon as possible. Records must include the concern, the adult's views and desired outcomes where known, actions taken, decisions made, rationale and follow-up.

Consideration will need to be given to immediately protecting the adult at risk and contacting the police and/or ringing for an ambulance if the adult at risk is injured or at risk of immediate harm.

Where the Care Act section 42 criteria may be met, the DSL will raise a safeguarding concern with the Local Authority responsible for the adult, using that authority's current referral route. Any member of staff may make a direct referral where necessary and must inform the DSL as soon as possible.

The safeguarding team will follow the relevant Local Authority and Safeguarding Adults Board procedures, including consideration of consent, capacity, advocacy, immediate protection, criminal investigation, section 42 enquiries and multi-agency risk management.

Concerns about an adult at risk should always lead to timely support. TMP College may need to escalate its concerns with Adult Services to ensure a referral is accepted.

Concerns that an adult at risk is being radicalised should follow the normal safeguarding referral mechanism with an additional Channel referral being made to the Local Authority's Prevent and Channel team. Further details are contained in TMP College's Anti-Radicalisation and Prevent Policy.

Managing safeguarding concerns about staff, volunteers and other adults working at TMP College

All staff and volunteers must report any safeguarding concern about the behaviour of a staff member, volunteer, contractor or other person working in or on behalf of the College without delay to the Principal or a Senior DSL. Concerns about the Principal must be reported to the Chair of the Board (or equivalent). Where the concern relates to an adult at risk, the College will consider the relevant Safeguarding Adults Board Person in a Position of Trust (PIPOT) procedure and any referral to the employer, Adult Social Care, Police, DBS or professional regulator. Where the concern also involves a child, the College will follow KCSIE 2026 Part Four and consult the LADO where appropriate. Concerns and decisions will be recorded securely and patterns reviewed.

TMP College's policy and procedures will support everyone to take action.

Abuse by another learner / adult-on-adult abuse

Adults at risk may experience abuse from another learner, peer, partner, family member or other adult. This can include physical, sexual, psychological, financial or discriminatory abuse; coercive or controlling behaviour; bullying and cyberbullying; exploitation; harassment; and non-consensual creation or sharing of intimate images, including AI-generated or manipulated images. Such behaviour must never be dismissed as banter or an inevitable part of college life.

Adults at risk with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in these adults at risk. Adults at risk who are LGBT or perceived to be, may also be targeted by their peers and harassed or assaulted.

The College will provide proportionate, person-centred support to the adult experiencing harm and will assess risk to all involved. External referrals will be made according to need and the adult's wishes, capacity and safety. Where the Care Act section 42 criteria may be met, an adult safeguarding concern will be raised with the relevant Local Authority.

TMP has a separate policy which gives more information on Child on Child Abuse, including the different type of abuse, how to assess them and the procedures for reporting concerns and incidents.

Taking, Storing and Sharing Photographs and Images of Children and Young People

TMP College has a separate Photography and Filming Policy. This sets out the College's overarching principles that guide our approach to photographs/videos being taken of children, young people and vulnerable adults during our events and activities.

Physical Restraint

The Education and Inspections Act 2006 confirmed the right of staff (those fully employed by the school) to use 'such force as is reasonable' for the purpose of preventing a student from:

- committing an offence
- causing personal injury to, or damage to the property of, any person (including themselves); and
- prejudicing the maintenance of good order and discipline.

The explanatory notes to the Act give an example of 'reasonable force' - leading a student by the arm to enforce an instruction to leave the class. However, nothing in the law concerning the use of reasonable force legitimizes corporal punishment. Where a school has students with known severe behavioural difficulties, only trained staff are allowed to use restraint techniques. The member of staff must be trained in the technique that is to be used. No staff can physically restrain students exhibiting extremes of behaviour unless so trained.

Circumstances Where Physical Restraint may be Justified:

- Physical restraint should only be used as a last resort; other non-physical strategies for diffusing the situation must be tried first.
- Whenever possible, the age, level of understanding and gender of the student should be considered. In addition, staff should be mindful of any student who is on the Child Protection Register.
- If there is a need to restrain a student with known behavioural difficulties, only staff trained in appropriate restraint techniques should attempt to restrain such students.
- The Governors recognise that in some instances (such as stopping a student who is running down a corridor) staff may have to act quickly, and without having the time to consider all the circumstances.

Examples of behaviour likely to lead to restraint:

- physical attack by a student on an adult/other student;
- deliberate damage to school property
- a student behaving in a way which places others at risk, e.g. pushing, tripping on a staircase, rough play or running in a corridor;
- preventing a student running into a busy road;
- refusal by a disruptive student to leave the classroom.

Restraint is not a punishment and must not be used as such.

Assistance should be sought whenever possible.

- the student(s) should be told that this has been done.
- any other students who are at risk should be removed.
- the use of restraint in a one-to-one situation should be avoided, witnesses are important.

Restraint should not lead to injury: staff should not:

- hold a student around the neck or collar, or in a way that might restrict breathing;
- slap, punch or kick;
- twist or force limbs against a joint; trip;
- hold or pull by the hair or ear; or
- hold a student face down on the ground.

On-line safety, data protection and the use of mobile phones and digital photographic equipment

Staff should also report any concerns about self-generated intimate images and/or videos, including AI-generated or manipulated images to the Designated Safeguarding Lead (or deputy) or a member of the leadership team who will follow the guidance in: Sexting in schools and colleges: Responding to incidents and safeguarding young people (UK Council for Child Internet Safety).

The following guidance provides clarity as to how staff should respond to these incidents:

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

TMP College's e-safety policy clearly outlines the way in which the college uses technology and the measures in place to ensure safe and responsible use by all. There is a clear code of conduct for staff which sets out the use of new technologies, mobile phones and personal photographic equipment around children.

Online safety is an integral part of safeguarding. Technology can facilitate abuse, exploitation, coercion, fraud, harassment, radicalisation and other harm. Staff should consider the four broad areas of online risk:

- content: exposure to illegal, inappropriate or harmful content, including misinformation, disinformation, extremist material and AI-generated or manipulated content
- contact: harmful interaction with others, including grooming, exploitation, coercion, scams and radicalisation

- conduct: online behaviour that increases the likelihood of, or causes, harm, including harassment and sharing intimate images without consent
- commerce: risks such as online gambling, inappropriate advertising, phishing, scams and financial exploitation

Staff should bring immediately to the attention of the Designated Safeguarding Lead (or deputy) or a member of the leadership team any behaviours by adults or children themselves that may be risky or harmful.

Safer Recruitment

TMP College will ensure that all appointments follow the guidance set out in its recruitment policy. TMP College will undertake all the required DFE pre-employment checks and where appropriate record these checks on the single central record and retain evidence in personnel files. TMP College will seek written confirmation that third-party organisations including contractor and alternative education providers have undertaken appropriate checks.

TMP College is required to make all relevant checks including the Disclosure and Barring Service (DBS) checks to ensure that staff recruited are appropriate for an educational environment. Appropriate action will be taken against staff (in service) who have committed a relevant offence. This includes reporting them to the Disclosure and Barring Service.

The safeguarding curriculum

The curriculum provides opportunities to help learners stay safe especially when online. Adults at risk should be aware of the support available to them.

Adults at risk will be supported to develop their understanding, where appropriate, of risks including: when using technology, the internet, and risks associated with grooming and radicalisation, gang and criminal exploitation and misusing drugs and alcohol. TMP College will ensure the curriculum promotes British Values as set out in the Counter Terrorism and Security Act 2015¹³.

Confidentiality, information sharing, record keeping and retention

Staff will be told of concerns about an adult at risk on a 'need to know basis'. TMP College understands the need to keep its safeguarding records securely.

Where requested by a new provider, TMP College will transfer records securely to the next setting and discuss the adult at risk's needs.

TMP College will retain records in keeping with legal guidelines and the TMP College Data Protection Policy.

¹³ <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>

Staff cannot promise adults at risk confidentiality but must always act in their best interest and share disclosures made by the adult at risk or others with the Safeguarding Lead (or deputy).

TMP College will normally seek the adult's consent to share safeguarding information where it is safe and appropriate to do so. Consent is not always required. Information may be shared without consent where there is a lawful basis and sharing is necessary and proportionate to protect the adult or others, prevent or detect crime, protect a child, or where the adult lacks capacity for the relevant decision. Staff must not allow uncertainty about data protection to prevent necessary safeguarding information sharing. The decision and rationale for sharing, or not sharing, must be recorded.

Complaints

Complaints about safeguarding should follow the procedures set out in TMP College's complaints policy.

TMP College and Local Authority also have whistleblowing procedures.

Local Safeguarding Referral Routes and Useful Contacts

TMP College supports learners from several Local Authority areas. Adult safeguarding concerns must be raised with the Local Authority responsible for the learner using its current safeguarding referral route. The College maintains a separate Local Authority Safeguarding Referral Websites sheet covering Wigan, Lancashire, Bolton, Salford, Warrington, Halton, Sefton and Wirral. Current Wigan Safeguarding Adults Board policy, procedure and referral information should also be consulted. In an emergency call 999.

<https://www.wigansafeguardingadults.org/index.aspx>

Local Authority Designated Officer (LADO): 01942 828300

Safeguarding in Education Team: 01942 486025

Police Public Protection Investigation Unit: 0161 856 7957 or 999 in an emergency

Police – Safeguarding Vulnerable Persons Unit: 0161 856 6583

Reporting Flow

What to do if you are worried about an adult at risk

1. RECOGNISE

Be alert to signs of abuse, neglect, exploitation, self-neglect, changes in behaviour or presentation, injuries, financial concerns, online harm or disclosures.

2. RESPOND

Listen calmly and take the adult seriously. Do not investigate or ask leading questions. Do not promise confidentiality. Explain that information may need to be shared to keep them or others safe.

3. IMMEDIATE SAFETY

If there is immediate danger, serious injury or urgent medical need, call 999. Take reasonable steps to keep the adult safe and inform a Senior DSL immediately.

4. REPORT

Report the concern without delay to a Senior DSL or wider DSL team member. Urgent concerns must be reported directly and must not be left solely as an electronic record.

5. RECORD

Open a Safeguarding Event on Databridge as soon as possible. Record factual information, the adult's own words where relevant, wishes and desired outcomes, actions taken, decisions and rationale. Complete a body map where injury is relevant.

6. CONSIDER CONSENT AND CAPACITY

Seek the adult's consent where appropriate. If capacity is in doubt, follow the Mental Capacity Act 2005. Lack of consent does not prevent information sharing where there is a lawful safeguarding reason.

7. DSL DECISION

Consider immediate protection, internal support, Adult Social Care / section 42 safeguarding concern, Police, health services, Prevent/Channel, advocacy, PIPOT or other specialist support.

8. REFER

Where the Care Act section 42 criteria may be met, raise a safeguarding concern with the Local Authority responsible for the adult using its current referral route.

9. REVIEW

Maintain 1:1 check-ins where appropriate, review the support and risk, record outcomes and re-refer or escalate if concerns remain or increase.

10. PROFESSIONAL CHALLENGE

If the College believes the adult remains at risk and the response is insufficient, use the relevant Local Authority / Safeguarding Adults Board escalation procedure.

Immediate danger: 999

Senior DSLs: Kim Pulman, Joanne Wale, Jackie Manning, Caroline Fell and Andrew Dickson.

Wider DSL Team: Tayla Cottom, Katie McKnight, Alex Wormald and Claire Brant.