



The Inns of  
Court College  
of Advocacy

# Cause for Concern Procedures

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# 1 Overview of Cause for Concern Procedures

These Procedures are designed to help COIC and ICCA staff to identify and respond to causes for concern in respect of the welfare or safety of all ICCA students and/or any child or adult at risk who comes into contact with ICCA activity.

**Part One of these Procedures** should be followed by ICCA staff who have any concerns about an enrolled student of the ICCA, whether-or-not that student is a child or an adult at risk.

**Part Two of these Procedures** should be followed by ICCA staff who are involved in any ICCA activity, such as a school visit, that may bring them into contact with children or adults at risk who are not ICCA students.

These Procedures should be read in conjunction with the ICCA Safeguarding Policy which sets out the ICCA's duty to safeguard children or adults at risk. This policy also recognises that the ICCA has a duty to promote the safety and wellbeing of all its students. While the procedures for responding to or reporting concerns about children or adults at risk may differ in some respects from those for responding to concerns about adults who are not at risk, many of the general principles of good practice are the same in both cases. Staff do need to be aware, however, that extra measures may need to be taken when responding to concerns about individuals who are under 18 or are adults at risk, or concerns about students who may be at risk of being drawn into extremist activity. It is important to identify which procedures should be followed in each

## Definition of Adult at Risk

An adult is any person aged 18 or over. Some adults may be deemed at risk and, therefore, entitled to be safeguarded because they are unable to protect themselves against significant harm or exploitation. The [London Safeguarding Adults Procedures](#) state that an adult at risk may be a person who:

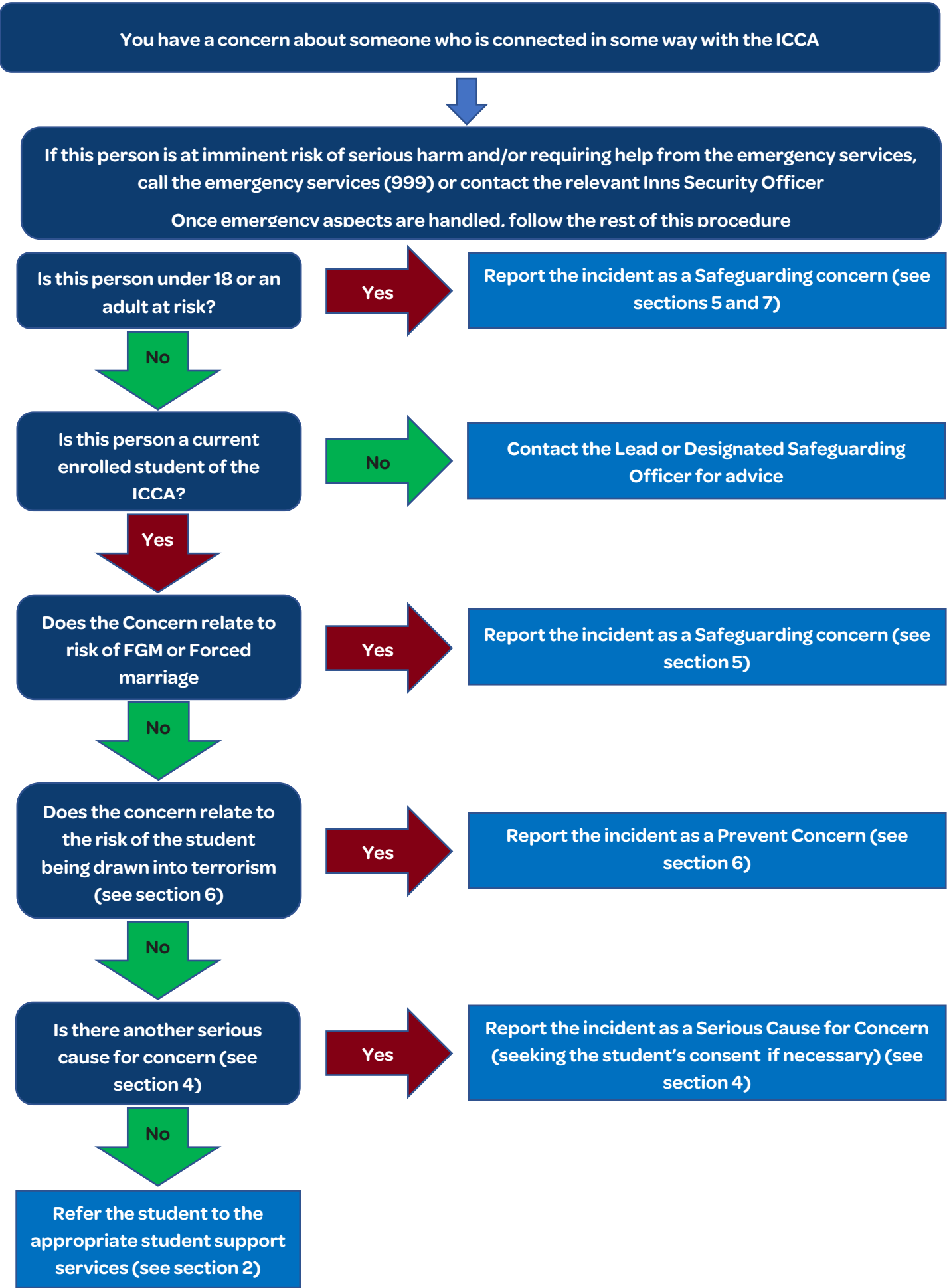
- Is elderly and frail due to ill health, physical disability or cognitive impairment.
- Has a learning disability.
- Has a physical disability and/or a sensory impairment.
- Has mental health needs such that their capacity is reduced.
- Has a long-term illness/condition.
- Misuses substances or alcohol.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

[Further guidance can be found here.](#) If you are concerned about an individual and either believe that they are under 18 or are an adult at risk, or are not sure, your concerns should be

referred directly to the Lead Safeguarding Officer ([arussell@icca.ac.uk](mailto:arussell@icca.ac.uk)) or Designated Safeguarding Officer ([ckessling@icca.ac.uk](mailto:ckessling@icca.ac.uk)).

All ICCA staff who have contact with students or who are engaged in any ICCA outreach activities should receive appropriate training on welfare and safeguarding issues, including the use of these procedures. Details of the appropriate level of training for members of ICCA staff are contained in the *Student Welfare, Safeguarding and Prevent Duty Staff Training Schedule* available [here](#). If you have not yet undertaken this training, or feel that you would benefit from further training, please contact your line manager or one of the ICCA Safeguarding Officers and this will be arranged for you.

An overview of how to follow the Cause for Concern Procedures is set out in the following flowchart:



# Part One: Responding to Concerns about ICCA students

Many concerns can be most effectively addressed by immediately referring the student to another member of the ICCA student support team, who will be able to offer appropriate assistance. You do not need to fill in a form for signposting students to support services.

## 2 Signposting Students to Support Services.

The ICCA has a number of different resources to which students can be referred for self-help:

- On Part One of the ICCA Bar Course, there are five online Modules relating to wellbeing and mental health including resources on managing stress and anxiety, developing, surviving and thriving in practice and resilience. These resources are available to any ICCA student throughout their period of study with the ICCA and for 12 months afterwards.
- The ICCA has procured the services of a 24/7 helpline for all staff and students. The telephone helpline for access to the resource is 0800 028 199. Health Assured can assist with Identity and LGBT, Bereavement and Loss, Debt and Financial, Relationships and Marital, Domestic abuse, Family Issues, Health and Lifestyle, Eldercare, Childcare and Caring for a dependant, Probate and Wills, Critical and Traumatic incidents, Career change - redundancy and redeployment, Sickness Absence, Discrimination, Bullying and Harassment.
- Where necessary, a student can access 6 individual counselling sessions via Health Assured per issue experienced by the student.
- Details of the service available through the ICCA with Health Assured [can be found here](#).

If the issue concerns the student's attendance or academic progress please advise the student to contact their personal tutor in the first instance or, if this is not possible or appropriate, to contact the Bar Course Leader ([ckessling@icca.ac.uk](mailto:ckessling@icca.ac.uk)).

If the matter relates to fees or finance, advise the student to contact Registry Services at [students@icca.ac.uk](mailto:students@icca.ac.uk).

If you are concerned that the student may have a Specific Learning Difficulty (SpLD) or a medical condition (including mental health) which would require learning and studying support, either by way of an Inclusion Plan (IP) or Personalised Assessment Arrangements (PAA) please refer the student to the Disability Support Consultant, Julie Winyard ([julieawin@btopenworld.com](mailto:julieawin@btopenworld.com)).

If you cannot immediately identify the appropriate support service or are unsure whether to follow the 'student of concern' procedure, below, please contact the acting Bar Course Leader ([ckessling@icca.ac.uk](mailto:ckessling@icca.ac.uk)) or the Student Services Manager ([kingram@icca.ac.uk](mailto:kingram@icca.ac.uk)) who will be able to advise you further.

### 3 Emergencies and Urgent Need

#### A Emergency need (imminent risk to self):

When a student is in immediate danger of harming themselves or have taken steps to take their life (i.e. have taken an overdose, have clear plans to harm themselves and have the means, have posted what looks like a suicide message on social media):

- The student should go to the nearest A&E Department.
- Call 999 to request an ambulance if the student is unable to, or would not go to the hospital themselves.
- If safe, and if time permits, also let Inns security know that an ambulance has been called and advise them where they should direct emergency services.

#### B Emergency need (imminent risk to others):

If a student is posing a risk to others, is violent or aggressive or under the influence of alcohol or substances and behaving in a concerning manner, call the relevant Inn's Security Officer. You may also need to call the Police on 999.

Inns Security contact numbers:

##### **Inner Temple**

Telephone 020 7797 8255 or email [porters@innertemple.org.uk](mailto:porters@innertemple.org.uk).

##### **Middle Temple**

Email [martin.dolby@middletemple.org.uk](mailto:martin.dolby@middletemple.org.uk) or telephone on 020 7427 4848.

##### **Gray's Inn**

Call Main Porters Lodge/ Security (manned 24/7) on 0207 458 7840 or contact Security Manager, Ashley Williams [ashley.williams@graysinn.org.uk](mailto:ashley.williams@graysinn.org.uk) (0207 458 7815), or Deputy Head Porter, Pat Newman (0207 458 7979)

##### **Lincoln's Inn**

Contact Chief Porter, Nicholas Bracey at [nicholas.bracey@lincolnsinn.org.uk](mailto:nicholas.bracey@lincolnsinn.org.uk) (direct line: 0207 693 5108) or contact the Wardens at the Gatehouse (0207 693 5190)

#### C If a student is reporting suicidal thoughts

If a student is reporting suicidal thoughts and intent to harm themselves but they have not acted on these thoughts or are not sure if they have or will, advise the student to call NHS 111 or the Samaritans 116 123 and they will contact the student to assess their needs.

If the student consents, you can advise the student that their phone number or email address will be passed on to external crisis services and they may contact the student to discuss their current needs. The student can additionally be referred to the 24/7 telephone helpline and counselling service offered by Health Assured.

Complete a [Student of Concern Form](#) after each or any of the above emergency situations as the student may need ongoing support or referral to external services.

## 4 Serious Cause for Concern

Serious concerns about students include concerns about:

- Female Genital Mutilation
- Forced marriage
- Mental or emotional abuse
- Sexual abuse
- Sexual harassment or assault
- Domestic abuse
- Non-recent abuse
- Suicide attempts
- Bullying and cyberbullying
- Neglect (including self-neglect)
- Suicidal thoughts or plans
- Mental ill-health
- Self-harm
- Substance misuse
- Physical ill-health
- Being the victim of crime
- Being subject to criminal investigation
- Visa expiry or non-compliance
- Losing their accommodation
- Prolonged lack of contact
- Financial deprivation
- Risk of radicalisation or being drawn into terrorism

Guidance on identifying possible signs of abuse and neglect is set out [here](#).

Guidance on identifying possible signs of being drawn into terrorism is set out in [Section 6 of these Procedures - Prevent Duty](#).

### Responding to a disclosure about a serious cause for concern

**If someone discloses something about their personal circumstances that gives rise to a serious cause for concern:**

- Respond in a calm manner.
- Allow them to talk without interruption, just accept what is said.
- Avoid physical contact with the under-18 or adults at risk unless absolutely necessary.
- Ensure that if any form of physical contact is required (e.g. to administer first aid or provide physical assistance) it is provided in view of others.
- Treat the comments seriously and provide reassurance that they were right to tell you.
- Take care not to ask them leading questions (i.e. avoid putting words into their mouth) but ensure that you have a clear understanding of what had been said explain that you will need to share what you have been told, but reassure them that it will only be disclosed to those that need to know.



- Make a full record of what you remember has been said, heard and seen.

## Confidentiality

If you have reason to believe that the individual making the disclosure is under 18 or is an adult at risk,

- Do not say you will keep it a secret or confidential or promise any outcome that may not be feasible in light of subsequent developments.
- Immediately contact the Lead Safeguarding Officer to arrange to discuss the matter.

If the individual making the disclosure is over 18 years old and is not an 'adult at risk', it is essential that you seek their consent before divulging the information to any other person, or reporting your concern, unless you have reason to believe that:

- They may have committed, or may be intending to commit, a criminal offence.
- They have been guilty of misconduct.
- They may cause harm to themselves or to others.
- They are at risk of being subjected to Female Genital Mutilation (FGM) (which should be reported as a suspected crime).
- They are at risk of, or may have been subjected to forced marriage.
- They are at potential risk of being drawn into terrorism (there is a duty to report this in line with the ICCA's obligations under the Prevent Duty) (see [Section 6: Prevent](#), below).

## If you have a serious cause for concern about an individual but nothing has been explicitly disclosed:

- Make a full record of what you remember has been said, heard and seen.
- If you have reason to believe that the individual is under 18 or is an adult at risk, do not seek to investigate the concern yourself but report your concerns to the Lead Safeguarding Officer immediately (at most within 24 hours).
- If the individual is an ICCA student who is over 18 and is not an adult at risk, you can discuss your concerns in confidence with the ICCA Bar Course Leader or the ICCA Safeguarding Officer.

## Reporting a concern

Any member of ICCA or COIC staff who is concerned about a student must consider whether to report their concerns and whom to report them to. The member of staff can report the incident themselves, using a [Student of Concern Form](#). Alternatively, they can ask any of the following to submit a Student of Concern Form on their behalf:

- Their line manager

- The Bar Course Leader
- The Lead Safeguarding Officer

## Safeguarding Concerns

The following concerns must be reported as quickly as possible (and within 24 hours):

- **Any** concerns about a student who is under 18 or an adult at risk.
- Concerns that a student has been or is at risk of being subjected to Female Genital Mutilation (FGM) as a suspected crime.
- Concerns that a student is being or has been subjected to forced marriage.

The person raising a safeguarding concern should not investigate the alleged or suspected abuse under any circumstances but should obtain sufficient information to refer the matter to a Safeguarding Officer. It is important that a report is made even if some of the information needed cannot be obtained or is uncertain to the reporter.

These concerns will be investigated as Safeguarding concerns under the Safeguarding Procedures set out in section 5, below. The concern should be clearly identified as a Safeguarding concern on the Student of Concern Form and the Form should be submitted to the Lead Safeguarding Officer ([arussell@icca.ac.uk](mailto:arussell@icca.ac.uk)) or Designated Safeguarding Officer ([ckessling@icca.ac.uk](mailto:ckessling@icca.ac.uk)).

## Prevent Concerns

A concern that a student is at potential risk of being drawn into terrorism must also be reported as quickly as possible (and within 24 hours). Such concerns will be managed as part of the ICCA's Prevent duty (see [Section 6](#), below). The concern should be clearly identified as a Prevent incident on the Student of Concern Form and the Form should be submitted to the ICCA Prevent Lead ([ckessling@icca.ac.uk](mailto:ckessling@icca.ac.uk)) or in her absence to the Lead Safeguarding Officer [arussell@icca.ac.uk](mailto:arussell@icca.ac.uk).

## Other Causes for Concern

Any other concerns about a student who is not aged under 18 and is not an adult at risk can also be referred using a [Student of Concern Form](#). In this case the Form should be sent in the first instance to the ICCA Registry Services Manager ([kingram@icca.ac.uk](mailto:kingram@icca.ac.uk)) who will refer it to the most appropriate member of staff (normally the Bar Course Leader). The person making the referral must, in most cases, seek the student's consent before making the referral (see '[Confidentiality](#)', above).

# 5 Procedures for Safeguarding ICCA Students

**This Part of the Procedure applies to:**

- Any concerns about a student who is under 18 or an adult at risk.

- Concerns that a student has been or is at risk of being subjected to Female Genital Mutilation (FGM) as a suspected crime.
- Concerns that a student is being or has been subjected to forced marriage.

## Reports of Safeguarding Concerns

Reports can be received in a variety of ways. This can include formal written reports, informal methods such as texts or social media, community feedback, a verbal report, or rumours or gossip. In line with the responsibilities above, any report heard by team members must be escalated to the appropriate staff member.

Team members, partners or anyone who comes into contact with our programmes, who have a complaint or concern relating to safeguarding should report it immediately. This can be to any of the following people that they feel most comfortable reporting it to:

- Line manager
- Designated Safeguarding Officer
- Lead Safeguarding Officer

They may also report the issue to another member of staff who may report on their behalf.

## 5.1 What to do when receiving a report about a Safeguarding concern

- 5.1.1 Reports can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the appropriate staff member in their organisation.
- 5.1.2 If a safeguarding concern is disclosed directly to a team member, the person receiving the report should bear the following in mind:
  - Listen.
  - Empathise with the person.
  - Ask who, when, where, what but **not** why.
  - Repeat/check your understanding of the situation.
  - Report to the appropriate staff member (see below).
- 5.1.3 The person receiving the report should document the following information
  - Name of person making report.
  - Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above.
  - Name(s) of alleged perpetrator(s).

- Description of incident(s).
  - Dates(s), times(s) and location(s) of incident.
- 5.1.4 If a staff member is unsure whether the person(s) concerned in the incident is under 18 or an adult at risk, the incident should be reported as safeguarding incident in any event.
- 5.1.5 The person receiving the report should then forward this information to the relevant Safeguarding contact within 24 hours. A Student of Concern Form should be completed and forwarded to the Lead Safeguarding Officer or Designated Safeguarding Officer who will be able to make a decision as to how best to investigate the incident.
- 5.1.6 Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.
- 5.1.7 If the reporting team member is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Lead Safeguarding Officer, or to an external statutory body. The team member will be protected against any negative repercussions as a result of this report.

## 5.2 How a report will be assessed and next steps decided

- 5.2.1 The Lead Safeguarding Officer will appoint a Decision Maker for handling this report.
- 5.2.2 The Decision Maker will determine whether it is possible to take this report forward
- Does the reported incident(s) represent a breach of safeguarding policy?
  - Is there sufficient information to follow up this report?
- 5.2.3 If the reported incident does not represent a breach of ICCA Safeguarding Policy or associated protocols but represents a safeguarding risk to others (such as a child safeguarding incident), the report should be referred through the appropriate channels (e.g. local authorities) if it is safe to do so.
- 5.2.4 If there is insufficient information to follow up the report, and no way to ascertain this information (for example if the person making the report did not leave contact details), follow the procedures in 5.2.8 below.
- 5.2.5 If the report raises any concerns that a student may be vulnerable to being drawn into terrorism this must be immediately referred to the ICCA Prevent Lead who may refer the matter to a relevant external agency, as appropriate.
- 5.2.6 If the report raises any concerns relating to children under the age of 18, **seek expert advice immediately**. If at any point in the process of responding to the report (for example during an investigation) it becomes apparent that anyone

involved is a child under the age of 18, the Decision Maker should be immediately informed and should seek expert advice before proceeding.

- 5.2.7 Clarify what, how and with whom information will be shared internally relating to this case in line with the confidentiality requirements of the case. The Lead Safeguarding Officer should be informed of anonymised details of all reports and has responsibility for ensuring the Dean of the ICCA and the ICCA Board of Governors receives appropriate information. The Dean of the ICCA and the ICCA Board of Governors will have the final decision on what further information they need to receive but should aim for confidentiality wherever possible. The Lead Safeguarding Officer has responsibility for working with the Dean of the ICCA and the ICCA Board of Governors to inform statutory bodies, as described within the protocol, and for advising the programme team on liaising with funding bodies.
- 5.2.8 If you have determined at this point to not take the report forward the report should be filed in case it can be of use in the future, and the responsible team look at any wider lesson learning to take forward.

## 5.3 What to do in managing a case: investigations and decisions

- 5.3.1 The Decision Maker should ensure that relevant expertise and capacity to manage a safeguarding case is in place. If you do not have this expertise in-house, **seek immediate assistance**, through external capacity if necessary.
- 5.3.2 If the report alleges a serious safeguarding violation, you may wish to hold a case conference. This should include:
- Decision Maker
  - Person who received the report (such as the Lead or Designated safeguarding officer, or manager)
  - HR manager
  - Safeguarding adviser (or equivalent) if there is one
  - Other staff if necessary

The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders. For reports relating to serious incidents the group should undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case and develop a mitigation plan if required. The risk assessment should be continually updated.

- 5.3.3 The Decision Maker decides the next steps. These could be (but are not limited to):
- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation's remit).
  - Investigation is required to gather further information (refer to 5.3.5 onwards).

- Immediate disciplinary action if no further information needed in line with the Capability & Disciplinary Procedure and the Academic Staff Disciplinary Procedure.
- Referral to relevant authorities in line with authority risk assessments.

If the report concerns associated personnel (for example contractors, consultants or suppliers), the decision-making process will be different, and may include terminating contracts or referring the report onwards.

If the decision results in the conclusion of the case, refer to 5.4: How to conclude the case.

- 5.3.4 Provide appropriate support to survivor(s) of safeguarding incidents. N.B. this could be provided as a duty of care even if the report has not yet been investigated. Support could include (but is not limited to):

- Psychosocial care or counselling.
- Medical assistance.
- Protection or security assistance (for example being moved to a safe location).

All decision making on support should be led by the survivor. Survivors should be made aware that support is available but support only provided on request.

- 5.3.5 If an investigation is required and internal capacity cannot be found, identify resources to conduct the investigation, including determining which budget this will be covered by. Projects should budget to fund investigations if they are to be required.

Refer to the ICCA's procedures for investigating breaches of policy. If these do not sufficiently cover the required safeguarding investigation, use external guidelines for investigating safeguarding reports, such as the CHS Alliance Guidelines for Investigations.

- 5.3.6 The Decision Maker makes a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for team member misconduct.
- 5.3.7 If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities unless this may pose a risk to anyone involved in the case. In this case, the Decision Maker together with other senior staff will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

## 5.4 How to conclude the case

- 5.4.1 Document all decisions made resulting from the case clearly and confidentially.

5.4.2 Store all information relating to the case confidentially, and in accordance with ICCA policy and GDPR.

5.4.3 Record anonymised data relating to the case to feed into organisational reporting requirements (e.g. serious incident reporting to the ICCA Board of Governors), and to feed into learning for dealing with future cases.

## 6 Prevent Duty

The aim of the Prevent duty is to “prevent people from becoming terrorists or supporting terrorism. This will also require challenge to extremist ideologies which can be made to justify terrorism and intervention with some extremists who are moving into terrorism.” (Prevent: 6.7)

Definitions of ‘terrorism’ and ‘extremism’ and information on the UK Government’s ‘Contest’ anti-terrorism strategy can be found [here](#).

The ICCA’s approach to meeting the requirements of the Prevent Duty is from the perspective of student wellbeing and safeguarding.

### Identifying a ‘Prevent duty’ cause for concern

There are a variety of reasons why people are attracted to extremist and terrorist activity. Among these factors are the following:

- A perception / experience of discrimination.
- Experience of racial or religious harassment.
- Negative views of policing.
- Lack of trust in democratic government.
- A perception that specific communities are being unfairly treated.
- An aspiration to defend specific communities when they are perceived to be under attack or unjustly treated.
- A perception of biased media coverage.
- UK foreign policy.
- Personality-driven factors.
- Family or local allegiances.
- A sense of belonging and purpose, with like-minded people.
- The promise of status, excitement and in some cases financial reward.
- Socio- economic factors, e.g. communities with significant terrorist activity generally score highest on a range of social deprivation indicators.
- Supremacist ideology, which sanctions the use of extreme violence as a response to perceived social injustice and dysfunction.

- A perception that a specific identity is under threat from social change.
- Rhetoric and language of apparently non-violent extremist groups.
- Peer pressure.
- Prospect of personal benefit.

The indicators of abuse or harm or the risk of being drawn into terrorism can be very difficult to recognise and it is not a staff member's responsibility to decide whether a student is at risk or is involved in extremist activity, but only to raise concerns that they may be. The following guidance may, however, help staff to identify signs that may be a cause for concern:

## Possible signs of vulnerability to being drawn into Terrorism

There is no single profile that could highlight someone as vulnerable to being drawn into terrorist activity. We go through various stages in our lives that can make us potentially vulnerable to outside influences (including radical influences). Our age, sex, race, religion or nationality do not make us any less or any more susceptible to radicalisation. However, individual circumstances, experiences or state of mind could lead towards a terrorist ideology.

- |   |   |
|---|---|
| ➤ Following extremist material through social media.                | ➤ A desire for status.  |
| ➤ Resentment to authority figures, an 'us vs. them' mentality.      | ➤ Being increasingly secretive.   |
| ➤ Difficult and moody behaviour.                                    | ➤ A need to dominate and control others.  |
| ➤ Social withdrawal.  | ➤ Being influenced or controlled by a group.  |
| ➤ Loss of interest in activities they used to enjoy.                | ➤ Feeling under threat, vulnerable or increasingly insecure.                                    |
| ➤ Ignoring views that are different to their own.                   | ➤ Feelings of grievance and injustice.  |
| ➤ Downloading extremist content and seeking likeminded individuals. | ➤ A need for identity, meaning and belonging.   |
| ➤ Susceptibility to indoctrination.                                 | ➤ Being exposed to extremist and terrorist ideology through family, friend and social networks. |

## Reporting a 'Prevent Duty' cause for concern

The ICCA has a Prevent Lead who works closely with communities and partner agencies such as Local Authorities, Education and Health, to safeguard vulnerable individuals who are at risk from being drawn into terrorist activity. Any staff member who has concerns that a



student or an individual associated with the ICCA may be at such a risk should raise their concerns with the Prevent Lead as soon as possible in order to receive appropriate advice and support.

The concern can be reported using a [Student of Concern Form](#), clearly identifying the concern as being the risk of being drawn into terrorism. This form should then be sent directly to the Prevent Lead ([ckessling@icca.ac.uk](mailto:ckessling@icca.ac.uk)) or the Lead Safeguarding Officer ([arussell@icca.ac.uk](mailto:arussell@icca.ac.uk)) who will liaise with the Prevent Lead. Alternatively, the member of staff may contact the Prevent Lead informally to discuss their concerns or can ask their Line Manager or the Lead Safeguarding Officer to contact the Prevent Lead on their behalf.

If your concern is raised as a result of a disclosure that has been made to you, it is important to remember that you cannot guarantee confidentiality to the person making the disclosure. You must inform them that you have a duty to report the information you have been given.

## Supporting the student at risk: The Channel strategy

If a concern about a student is raised with the Prevent Lead the Prevent Lead will immediately alert the Regional Prevent Coordinator and other relevant community agencies to attempt to manage any immediate risk to, or by, the student concerned and to attempt to provide outreach support to the student. Supporting those at risk of being drawn into terrorism is often about diverting people away from potential harm at an early stage. The UK's 'Prevent' counter-terrorism strategy is focused on providing practical help to stop people from being drawn into terrorism. The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

People who are found to be at risk of being drawn into terrorism are then offered support through the 'Channel' process, which involves several agencies working together to give individuals access to services, such as, health, education, specialist mentoring and diversionary activities. Through the Channel process, the nature and extent of the vulnerability or risk is assessed and an appropriate support package; consisting of specific services is tailored to an individual's needs.

'Channel' is not about reporting or informing on individuals in order to prosecute them. It is about communities working together to support vulnerable people at an early stage, preventing them from being drawn into terrorism. Channel is based on the premise that people being drawn into terrorism and recruitment can be identified and then provided with appropriate support, which may dissuade them from engaging in terrorist-related activity. Participation in the programme is voluntary.

## Part Two: Safeguarding under 18's and Adults at Risk who are not Students of the ICCA

**These Procedures apply to any activity organised by the ICCA which involves individuals who are aged under 18 and/or are adults at risk but who are not enrolled students of the ICCA**

The ICCA is a predominantly adult learning environment. However, there are circumstances when children (including young people) and adults at risk may interact with staff and students of the ICCA. These include, but are not limited to:

- Outreach or widening participating activities taking place on or off campus.
- Events and Conferences.
- Volunteering activities.

Some general guidance on good practice when engaging with children and adults at risk is set out [here](#). When visiting schools and colleges, staff and representatives of the ICCA should also ensure they are aware of local safeguarding policies and procedures for the premises and the point of contact for raising safeguarding concerns within the setting. In England, social services offer a point of contact in the Local Authority Designated Officer (LADO) for each county/region for this purpose, should it be necessary to report beyond the specific school.

Where any ICCA outreach activity is planned that will necessarily involve interaction with under 18's and adults at risk the ICCA must also appoint a Safeguarding Contact to oversee this activity. The Safeguarding Contact must carry out a risk assessment in respect of the proposed activity. The Safeguarding Contact should seek advice from the Lead or Designated Safeguarding Officer when completing the risk assessment and the final risk assessment must be returned to the Lead Safeguarding Officer for approval. A risk assessment template can be found [here](#).

## 7 Reporting Safeguarding Incidents under this Part of the Procedure

Any incident that involves harm or risk of harm being caused to a person who is under 18 or an adult at risk (but who is not an ICCA student) at an ICCA activity must be reported immediately to the Safeguarding Contact responsible for the activity. Within 24 hours of the incident, the Safeguarding Contact must record the details of the incident on [Safeguarding Incident Form](#) and return it to the Lead or Designated Safeguarding Officer.

The Safeguarding Contact must also decide whether any other party should immediately be informed of the incident. This might include informing:

- A parent, carer or other responsible adult
- The police
- Social Services

If the Safeguarding Contact has any concerns about whom to report the incident to, they should contact the Lead or Designated Safeguarding Officer.

On receipt of the Incident Report Form, the Lead or Designated Safeguarding Officer will consider whether a formal investigation should be carried out into the incident. Any such investigation will be conducted in accordance with the Safeguarding case management procedures set out in section 5 of these Procedures.

# Appendix 1: Definition of Adult at Risk

An adult is any person aged 18 or over. Some adults may be deemed at risk and, therefore, entitled to be safeguarded because they are unable to protect themselves against significant harm or exploitation. The [London Safeguarding Adults Procedures](#) state that an adult at risk may be a person who:

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

An adult may be temporarily or permanently at risk due to a specific situation or context. This may include care-experienced people under the age of 25, young adult carers, refugee and asylum-seekers, and people estranged from their family.

In law, an adult is deemed to have capacity to give or withhold consent to social services referrals, medical examinations, etc. If it is believed that an adult is at risk of harm and may need protection, a responsible person must consider if the individual is capable of giving consent. If this is so determined, a professional acting on behalf of the organisation must seek the individual's consent before taking any action, such as, a referral to social services or the police.

There are some exceptions to this rule where consent is not required. These are:

- Where there is a duty to act (e.g. a crime may have taken place); or
- When it is in the public interest to act (e.g. another person or people, child or adult, is/are put at risk); or
- When it is suspected that the individual may be under the undue influence of someone else.

## Appendix 2: Student of Concern Form

<h3>Student of Concern Form</h3> <p>This form should be used to report any serious cause for concern about an enrolled student of the ICCA.</p> <p><b>Please read all sections of this form</b></p>	
<b>Section 1:</b> Details about the student of concern <i>(If you are making a self-referral, please indicate this in the summary of concerns box)</i>	
Name of Student	
Student ID No. (if known)	
<b>Section 2:</b> Safeguarding Concerns	
Is the Student aged under 18?	Yes / No
Do you have reason to believe that the Student may be an adult at risk?	Yes / No
Does your concern include the possibility that the student has been, or is at risk of being subject to Female Genital Mutilation?	Yes / No
Does your concern include the possibility that the student has been, or is at risk of being subjected to forced marriage?	Yes / No
<p><i>If you have said 'yes' to any of the above, please complete the summary of concerns box at Section 5, below and return the form to the Lead Safeguarding Officer (<a href="mailto:arussell@icca.ac.uk">arussell@icca.ac.uk</a>) or the Designated Safeguarding Officer (<a href="mailto:ckessling@icca.ac.uk">ckessling@icca.ac.uk</a>). If you have said 'no' to all, please proceed to section 3.</i></p>	
<b>Section 3:</b> Concerns about Radicalisation	
Does your concern include the possibility that the student is at risk of being drawn into terrorism or is at risk of radicalisation?	Yes / No
<p><i>If you have answered 'yes', please complete the summary of concerns box at section 5, below and return the form to the Prevent Lead (<a href="mailto:ckessling@icca.ac.uk">ckessling@icca.ac.uk</a>) or, in her absence, the Lead Safeguarding Officer (<a href="mailto:arussell@icca.ac.uk">arussell@icca.ac.uk</a>).</i></p>	
<b>Section 4:</b> Serious Concerns	

If you have any other serious cause for concern about a student who is over the age of 18 and is not a vulnerable adult, please complete the summary of concerns box in Section 5, below and return the form to the ICCA Registry Services Manager ([kingram@icca.ac.uk](mailto:kingram@icca.ac.uk)) who will direct your concern to the most appropriate member of staff. If you require immediate advice or assistance, please contact the Lead Safeguarding Officer ([arussell@icca.ac.uk](mailto:arussell@icca.ac.uk)) or the Bar Course Leader ([ckessling@icca.ac.uk](mailto:ckessling@icca.ac.uk)). Guidance on what might constitute a serious cause for concern is set out in the notes at the end of this form.

### Section 5: Summary of Concerns

### Section 6: Your Details

*(In case we need more information, we do need the details of the person making the referral)*

Name:

Email address:

Contact telephone number:

Date:

#### Notes: Serious causes of concern may include any of the following:

- Female Genital Mutilation
- Forced marriage
- Mental or emotional abuse
- Sexual abuse
- Sexual harassment or assault
- Domestic abuse
- Non-recent abuse
- Suicide attempts

- Bullying and cyberbullying
- Neglect (including self-neglect)
- Suicidal thoughts or plans
- Mental ill-health
- Self-harm
- Substance misuse
- Physical ill-health
- Being the victim of crime
- Being subject to criminal investigation
- Visa expiry or non-compliance
- Losing their accommodation
- Prolonged lack of contact
- Financial deprivation
- Risk of radicalisation or being drawn into terrorism

## Appendix 3: Identifying the Signs of Abuse and Neglect

The following guidance on identifying signs of abuse and neglect was primarily designed to assist those responsible for the wellbeing of children or adults at risk but the definitions and guidance are also relevant in identifying concerns about all ICCA students.

### Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to an individual. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### Possible signs of physical abuse

- Unexplained, untreated or unusual injuries: bruises, burns, scalds, bite marks, particularly if frequent.
- Improbable excuses given to explain injuries or refusal to discuss injuries.
- Admission of punishment which appears excessive.
- Fear of parents being contacted.
- Withdrawal from physical contact.
- Arms and legs kept covered in hot weather.
- Fear of returning home.
- Self-destructive tendencies.
- Aggression towards others.
- Running away.
- Bald patches.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens.

Babies and disabled children also have a higher risk of suffering physical abuse.

Physical abuse can lead directly to neurological damage, physical injuries, disability or - at the extreme - death.

Harm may be caused to children both by the abuse itself, and by the abuse taking place in a wider family or institutional context, (e.g. bullying) of conflict and aggression.

Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems, and educational difficulties.

### Sexual Abuse

A form of abuse involving forcing or enticing a child, young person or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving

children in looking at pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Possible signs of sexual abuse**

- Sudden changes in behaviour or educational performance.
- Chronic throat infections and sexually transmitted diseases.
- Displays of affection in a sexual way.
- Tendency to cling or need constant reassurance.
- Tendency to cry easily.
- Regression to younger behaviour, e.g. thumb sucking, playing with discarded toys, "baby" behaviour.
- Complaints of genital itching or pain.
- Fear of undressing for sport or during hot weather.
- Use of sexual language, display of knowledge or interest in sexual acts inappropriate to their age (i.e. under 18s).
- Distrust of a familiar adult, or anxiety about being left with a relative, baby-sitter, lodger.
- Unexplained gifts or money.
- Depression or withdrawal.
- Apparent secrecy.
- Wetting or soiling day or night - after being dry for some time.
- Sleep disturbance or nightmares.
- Eating disorders.
- Self-harm, attempted suicide, frequently running away.
- Unexplained pregnancy.
- Phobias or panic attacks.
- Talk of "cutting" or "being cut" (FGM).
- Children who ask others to behave sexually or play sexual games

But not all sexually abused children exhibit signs of disturbance. Some will be "model" pupils/students.

### **Possible signs of child sexual exploitation (NB: could also apply to adults at risk)**

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older boyfriends or girlfriends.
- Children who suffer from sexually transmitted infections or become pregnant.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education or don't take part in education.



Child sexual exploitation involves sexually exploitation for money, power or status. It can involve violent, humiliating and degrading sexual assaults.

In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them.

Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

## Emotional or Psychological Abuse

A form of abuse which may involve the persistent emotional maltreatment of an individual, such as, to cause severe and persistent adverse effects on emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving a child or adult at risk the opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child or adult at risk's developmental capability as well as overprotection and limitation of exploration and learning or preventing the individual participating in normal social interaction. It may involve serious bullying (including cyber bullying), causing individuals to frequently feel frightened or in danger, or the exploitation or corruption.

### Possible signs of emotional or psychological abuse

- Physical, mental and emotional development delay.
- Admission of punishment which appears excessive.
- Withdrawn, fearful or anxious about doing something wrong.
- Over-reaction to mistakes.
- Continual self-disapproval.
- Sudden speech disorders.
- Fear of new situations.
- Inappropriate emotional response  
Behaviour such as rocking, hair twisting, thumb-sucking.
- Evidence of bullying (including cyberbullying)
- Fear of parents being contacted.
- Extremes of passivity or aggression.
- Drug/solvent abuse.
- Self-harm.
- Running away.
- Compulsive stealing, scavenging.
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder'.
- Parents or carers blaming their problems on their child.
- Parents or carers who humiliate their child, e.g. by name-calling or making negative comparisons

There is increasing evidence of the adverse long-term consequences for children's development where they have been subjected to sustained emotional abuse.

Emotional abuse has an important impact on a developing child's mental health, behaviour, and self-esteem. It can be especially damaging in infancy.

Underlying emotional abuse may be as important, if not more so, than other more visible forms of abuse in terms of its impact on the child.

Domestic violence, adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse.

## Domestic Violence or Abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to psychological, physical, sexual, financial and emotional. Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour'-based violence, female genital mutilation and forced marriage.

### Possible signs of domestic violence or abuse

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- Low self-esteem.
- Feeling the abuse is their fault.
- Acts of assault, threats, humiliation and intimidation.
- Harming, punishing, or frightening the person.
- Isolating the person from sources of support.
- Exploitation of resources or money.
- Preventing the person from escaping.
- Abuse.
- Regulating everyday behaviour.
- Physical evidence of violence such as bruising, cuts, broken bones.
- Verbal abuse and humiliation in front of others.
- Fear of outside intervention.
- Damage to home or property.
- Isolation – not seeing friends and family.
- Limited access to money.

## Neglect

The persistent failure to meet basic physical and psychological needs is likely to result in the serious impairment of health or development. This may involve factors, such as, inappropriate clothing, food, inappropriate attention, lack of supervision, lack of safety or exposure to undue cold or unnecessary risk of injury. It may also include neglect of basic emotional needs.

- Constant hunger or tiredness.
- Poor personal hygiene/dental decay or basic healthcare.
- Poor or inadequate state of clothing.
- Emaciation (abnormally thin)

- Untreated medical/speech/ hearing problems or injuries.
- Living in a home that is indisputably dirty, unsafe or dangerous, i.e. around drugs, alcohol or violence.
- Frequent lateness or absence from school.
- Lack of appropriate boundaries.
- Lack of supervision/safety
- Destructive tendencies.
- Low self-esteem.
- Neurotic behaviour.
- No social relationships.
- Running away.
- Compulsive stealing or scavenging

### **Possible signs of self-neglect – as above and/or...**

- Neglecting personal hygiene, health or surroundings.
- Inability to avoid self-harm.
- Failure to seek help or access services to meet health and social care needs e.g. taking medication, treating illness/injury.
- Unable or unwilling to manage one's personal affairs.
- Risks to personal health and safety.
- Lack of essential food, clothing or shelter.
- Malnutrition and/or dehydration.
- Living in squalid or unsanitary conditions.
- Neglecting household maintenance.
- Hoarding.
- Keeping animals in inappropriate conditions.

Neglect (including self-neglect) is not always straightforward to identify.

Neglect may occur if a parent/carer becomes physically or mentally unable to care for a child. A parent/carer may be addicted to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child.

Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

Persistent and/or severe neglect is associated with major impairment of health, growth and intellectual development and long-term difficulties with social functioning, relationships and educational progress. In extreme cases, it can result in death.

## **Financial or material abuse**

*(normally connected more with adults than children)*

The illegal or unauthorised theft or use of a person's property, money or other valuables.

Financial abuse usually takes the form of one or more of the following:

- Theft.
- Exploitation.
- Pressure in connection with wills, property or inheritance or financial transactions.
- Fraud.

- Forgery.
- Blackmail.
- Misuse or misappropriation of property, possessions or benefits.

A wide range of people are vulnerable to financial crime. The Office of Fair Trading's (OFT) report on The Psychology of Scams (2009) implies that there is no single risk factor and, in fact, at one point or another, everyone is vulnerable to a persuasive approach.

A perpetrator may be a family member, friend, care worker/professional or a stranger who has chosen to target an adult at risk. There is a growing trend of MATE crime, where perpetrators deliberately befriend individuals in order to gain their trust and subsequently commit financial abuse.

Abuse can range from not acting in the person's best interests, to persuasion or coercion in respect of gifts or loans, misappropriation of property or allowances, theft, rogue trading, or mass-marketing fraud.

## Discriminatory abuse

Treating a person less favourably, and therefore denying their human and/or civil rights, based solely on class or category, i.e. gender, disability, ethnicity, religion, preferred language, etc (known as 'protected characteristics' under the Equality Act 2010). Discriminatory behaviours take many forms, but they all involve some form of exclusion or rejection.

### Possible signs of discriminatory abuse

- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic.
- Harassment or deliberate exclusion on the grounds of a protected characteristic.
- Denying basic rights to healthcare, education, employment, criminal justice relating to a protected characteristic.
- Substandard service provision relating to a protected characteristic (e.g. not taking account of the person's individual needs).

## Organisational or Institutional Abuse

Occurs when an individual's wishes and needs are sacrificed to a smooth running of a group, service or organisation. It involves the mistreatment of people brought about by poor or inadequate care or support and is characterised by systematic poor practice including inappropriate use of rules, rituals, routines and/or restrictive practices. These may all damage a person's right to independence, respect, dignity or choice

### Possible signs of organisational or institutional abuse

*(more commonly found in care homes etc.)*

- Discouraging visits or the involvement of relatives or friends/absence of visitors.
- Not providing adequate food and drink, or assistance with eating.
- Absence of individual care plans.
- Run-down/overcrowded establishment.
- Misuse of medication.
- Insufficient staff or high turnover resulting in poor quality care.
- Inappropriate use of restraints.
- Lack of respect for dignity and privacy.
- Failure to provide care with dentures, spectacles or hearing aids.
- Failure to respond to complaints or allegations of abuse appropriately.
- Interference with personal correspondence or communication.
- Abusive and disrespectful attitudes towards people using the service.
- Lack of personal clothing and possessions and communal use of personal items.
- Poor record-keeping/missing documents.
- Public discussion of personal matters.
- Unnecessary exposure during bathing or using the toilet.
- Failure to manage residents with abusive behaviour.

## Modern Slavery

Modern slavery takes a variety of forms, the most common of which are:

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

Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

### Possible signs of Modern Slavery

- Signs of physical or emotional abuse.
- Isolation from the community, seeming under the control or influence of others.
- Appearing to be malnourished, unkempt or withdrawn.
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address.
- Lack of personal effects or identification documents.
- Always wearing the same clothes.

- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers.

- Fear of law enforcers.

## **Additional Terminology associated with abuse**

### **Female Genital Mutilation**

FGM is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse.

### **Hate Crimes**

Hate crimes are crimes motivated by prejudice, hatred or intolerance that intentionally demean or harm individuals and groups, defined by their actual (or perceived): ethnicity, race, religion and belief, sexuality, gender, conscience, disability, age or lawful working practices. They create an environment in which people experience or could reasonably fear, harassment, intimidation or violence. Hate crime is unlawful and the ICCA will treat it as a form of harassment under this Policy. The ICCA reserves the right to report to the Police any incident which it believes may constitute a criminal offence.

### **Forced/Arranged Marriages**

A forced marriage is one in which one or both parties are married without their consent, unlike an arranged marriage where both parties consent to third party assistance in identifying a spouse. An arranged marriage becomes a safeguarding issue where the person concerned is a child or is an adult who lacks mental capacity. Adults with learning disabilities have the right to get married but must have capacity to consent. No one can consent to marriage on behalf of someone else.

### **Online Abuse**

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and adults at risk may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children and adults at risk can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming) or it may be that the abuse only happens online (for example persuading children or adults at risk to take part in sexual activity online).

### **Bullying and Harassment**

The terms 'bullying' and 'harassment' are often used interchangeably, and bullying may be seen as a form of harassment. Bullying and harassment can take place in relation to any individual, who may not necessarily be a child or adult at risk. Bullying and harassment can take place through 'actively' harmful behaviour (such as name calling) or through passive behaviour (such as intentionally excluding someone). The behaviour is unwarranted and unwelcome and generally has the purpose or effect of, "violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Bullying may be characterised

as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.” (Equality Act, 2010).

We acknowledge, with thanks, the work of King’s College London and Northumbria University whose safeguarding documentation forms the basis of this document. (Some of the above content has been sourced from the Care Act 2014, Assessment: financial crime against adults at risk (Social Care Institute for Excellence, Nov 2011), Working Together to Safeguard Children (2015) statutory guidance, and training materials produced by Newcastle City Council School Improvement Service and Newcastle Safeguarding Board).

## Appendix 4: Terrorism, Extremism and the UK Government's 'Contest' anti-terrorism strategy.

The UK government's anti-terrorism strategy, named 'Contest', consists of four work-streams, known as the 'four P's': *Prevent*, *Pursue*, *Protect*, and *Prepare*.

### Prevent

Aim: To "prevent people from becoming terrorists or supporting terrorism. That will also require challenge to extremist ideologies which can be made to justify terrorism and intervention with some extremists who are moving into terrorism." (Prevent: 6.7)

### Pursue

Aim: "To stop terrorist attacks by detecting, prosecuting and otherwise disrupting those who plot to carry out attacks against the UK or its interests overseas."

### Protect

Aim: "To strengthen protection against a terrorist attack in the UK or against its interests overseas and so reduce their vulnerability. The work focuses on border security, the transport system, national infrastructure and public places."

### Prepare

Aim: "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 the UK's resilience so we can recover from its aftermath."

## Definitions

**Extremism:** Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

**Terrorism:** The current UK definition of terrorism is given in the Terrorism Act 2000. This defines terrorism as 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. The terrorist 'action' can be that of individuals acting alone or as part of organised or well-trained groups. Four domains are identified: (a) International terrorism, (b) Northern Ireland related terrorism, (c) Extreme Right-Wing terrorism and (d) other forms of both secular and religious terrorism (Prevent: Section 5). 18



## Appendix 5: Safeguarding Others: Guidance on Good Practice

ICCA staff are not expected to take responsibility for students in other educational establishments. Students remain the responsibility of their regular staff members. ICCA staff should avoid situations where they might be left alone with students from other establishments, should ensure that the room/space is appropriate to the situation, and should always offer the student the choice to be accompanied by a person of their choosing.

The following Code of Practice provides guidance for staff taking part in activities which involve under 18's and adults at risk.

### DO

- Maintain the boundaries of your role when supporting/advising students and refer onto specialist services.
- Treat everyone equally and with respect.
- Plan activities, and interact with, under 18s and adults at risk within sight and earshot of others, preferably with at least one other present.
- Ensure that the parent (or those with parental responsibility) gives consent and, whenever possible, encourage the participant to assent (e.g. in research activities).
- Follow any recommended adult-to-young people ratios for meetings and activities.
- Avoid situations that could affect relationships within the group.
- Allow under 18s and adults at risk to talk about any concerns they have.
- Challenge inappropriate actions and language - encourage others to talk freely about attitudes or behaviours they don't like.
- Remember this Code when responding to bullying, bereavement or abuse and use in conjunction with other ICCA guidance on Bullying and Harassment.
- Avoid inappropriate behaviour.
- Remember this code during all digital communications.
- Remember that others might misunderstand your behaviour, however well meant.
- Respect a young person's right to personal privacy BUT take any allegations or concerns of abuse seriously and refer them to the Lead Safeguarding Officer or Designated Safeguarding Officer immediately.

### DON'T

- Be overly familiar or take part in inappropriate behaviour or contact, whether physical, verbal or sexual e.g. play fights, insults, obscene gestures.
- Form a relationship that is an abuse of trust.

- Share personal information about yourself with under-18s or adults at risk.
- Act in a way that can be perceived as threatening or intrusive.
- Engage in regular private contact with under-18s or adults at risk via phone, text or social media, to avoid relationship boundaries becoming blurred.
- Make threats or suggestive or offensive remarks, or lewd or sexually explicit comments.
- Engage in inappropriate physical contact games.
- Search for unlawful items on another person.
- Trivialise abuse or allow bullying or abusive activities e.g. initiation ceremonies.
- Let allegations, suspicions, or concerns about abuse go unreported.
- Take photographs or videos without written parental/guardian/carer consent

# Appendix 6: Safeguarding Risk Assessment Template

## Risk assessment – safeguarding children and/or adults at risk

<b>Project/Initiative Name:</b>	
<b>Details/descriptions of location(s) of events/activities:</b>	
<b>Dates/timescales for the project:</b>	
<b>Name of person completing this risk assessment:</b>	
<b>Job Title:</b>	
<b>Signature and Date:</b>	

## Project

**Description of potential risk to children or adults at risk:**

**Outline of mitigations/ measures already in place to help manage this risk**

**Current Risk Rating (based on mitigations/ measures already in place)**

**Outline of planned mitigations / new measures to further manage the identified risk**

Probability (P):

Impact (I):

Overall Risk Score (P+I):

**Future Risk Rating (based on planned mitigations/ new measures, assuming these are in place)**

Probability (P):

Impact (I):

Overall Risk Score (P+I):

For the scoring columns, we use a scoring system based on the HSE template for assessing likelihood, impact and the overall risk score/colour rating – as described below:

**Stage one** of the risk rating process is to determine the **probability (P)** of an event arising (from 1-5). The higher the likelihood score, the more urgent is the requirement for immediate action to be taken. For most activities, consider the scoring to reflect the following descriptions of likelihood:

1. Rare/remote
2. Unlikely
3. Possible
4. Likely
5. Almost certain

**Stage two** of the risk rating process involves considering the **impact (I)** that would result if the risk was to occur. In scoring impact, the anticipated outcome of the risk is graded on a scale of 1-5, 1 being negligible impact, 5 indicating a more serious Impact. The key descriptors below (e.g. “Not significant”, “Minor”, etc.) are to be borne in mind when scoring the impact.

1. Not significant
2. Minor
3. Moderate
4. Major
5. Severe

**Stage three** involves plotting both the probability and impact scores on the Risk Matrix grid to achieve the overall risk score (**P x I**) – this assigns a colour and numerical score rating. For example, a ‘moderate impact’ 3 and a ‘possible probability’ 3 will result in a rating of an amber 9).

- High risks are scored between 15 and 25 and are coloured **red**.

- Medium risk are scored between 6 and 12 and are coloured **amber**.
- Low risks are scored between 1 and 5 and are coloured **green**.

# Appendix 7: Safeguarding Incident Form for under 18s and Adults at risk who are not ICCA students

## Safeguarding Incident Form

This form should be used to report any incident occurring during any ICCA activity organized by the ICCA where the incident involves harm or risk of harm being caused to any person who is under 18 years of age or who is an adult at risk and where that person is NOT an enrolled ICCA student. If the incident concerns an ICCA student, please complete a Student of Concern Form.

**Please ensure that this Form is completed as soon as possible after the incident and returned to the ICCA Lead Safeguarding Officer ([arussell@icca.ac.uk](mailto:arussell@icca.ac.uk)) or the Designated Safeguarding Officer ([ckessling@icca.ac.uk](mailto:ckessling@icca.ac.uk)) within 24 hours of the incident**

Name of team member reporting incident

Role of team member reporting

Name of Safeguarding Contact recording the incident (if different)

Date of reporting

Survivor name (if different)

Survivor e-mail address

Survivor mobile number

Alleged perpetrator name

Has the incident been reported elsewhere yet (internally/externally)? Yes / No

If yes, to whom?

Date of Incident

### Summary of Incident

What did the incident involve? (Include all relevant details along with any background; prompt student for additional information if required) – NB. **You must not ask the reportee any leading questions – let them tell the account. Do not promise confidentiality.**

Where did the incident take place?

Who else was involved?

**Has the survivor done anything about the incident to date?**

**The rest of this form to be completed by the lead or designated safeguarding officer**

Who needs to be informed about this event?

- ☐ Parent
- ☐ Police
- ☐ Social Services
- ☐ Other (please state)

**Does the survivor need to be referred to further support?** Yes / No

**If yes, indicate which support service(s) the survivor should be referred to**

**Who needs to be involved in deciding next steps?**

**Summary of any meetings relating to this incident**

**Does there need to be a formal investigation into the incident?**

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**Investigator appointed and budget approved**

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**Attach any investigation report to this form**

**Final resolution summary**

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**Date of Resolution (if applicable)**

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**Final Sign-off (Name, Position, Date)**

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## Appendix 8: Student Welfare, Safeguarding and Prevent Duty Staff Training Schedule

Area	Specific Training	Staff (M) = Mandatory (O) = Optional	Date initial training to be completed by	Additional training
<b>Safeguarding Training</b>	Referral guidance and advice on safeguarding matters.	All CIOC and ICCA staff <b>(M)</b>	March 2021	All new employees - within induction process.
	Awareness training	All CIOC and ICCA staff <b>(M)</b>	March 2021	All new employees - within induction process. Annual update.
	Advanced Safeguarding for Designated Staff	ICCA Head of Programmes ICCA Academic Staff <b>(M)</b> ICCA Registry Services Manager <b>(M)</b> ICCA Operations Support Staff <b>(O)</b>	March 2021	Any new role-holder. Annual update.
	Advanced Safeguarding for Designated Safeguarding Leads	Lead Safeguarding Officer <b>(M)</b> Designated Safeguarding Officer <b>(M)</b>	September 2020	Any new role-holder. Ongoing as advised.
<b>PREVENT Training</b>	Prevent Awareness training	All CIOC and ICCA staff <b>(M)</b>	March 2021	All new employees - within induction process. Annual update.
	Advanced Prevent Training - inc. online forum risks and referrals	Prevent Lead <b>(M)</b> COIC Director of Operations <b>(O)</b>	To be delivered 14 July 2020	Any new role-holder. Ongoing – updated as advised by OfS Prevent.

	to Channel Programme	Heads of Online Learning <b>(M)</b> ICCA Dean <b>(O)</b> ICCA Head of Programmes <b>(O)</b>		
<b>Personal Tutor Training</b>	Overview of ICCA Policies and Procedures	ICCA Academic Staff <b>(M)</b>	September 2020	All new employees - within induction process. Update by March 2021. Annual Update thereafter.
	Dealing with Wellbeing issues (including guide to online resources)	ICCA Academic Staff <b>(M)</b>	September 2020	All new employees - within probation period Update by March 2021. Annual Update thereafter.
<b>Student Support Training</b>	Student of Concern Procedure and Signposting Students to Appropriate Services	ICCA Academic Staff <b>(M)</b> ICCA Registry Services Manager <b>(M)</b> ICCA student support staff <b>(M)</b>	September 2020	All new employees - within induction process. Update by March 2021. Annual Update thereafter.