

Safeguarding & Prevent Policy

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1. Background and Scope

1.1. Background

This Safeguarding and Prevent Policy outlines the dual responsibilities of all stakeholders within LCK Academy (LCKA), encompassing staff, students, and other participants in LCKA activities, regarding the safety and well-being of vulnerable adults, as well as the prevention of radicalisation and extremism in accordance with the Prevent agenda of Higher Education Providers under the Counter-Terrorism and Security Act 2015.

The Academy acknowledges its obligation to ensure the safety of its students, staff, and stakeholders throughout their engagement with Academy provisions. Recognising the common law duty of care incumbent upon training providers, LCKA is committed to undertaking reasonable measures to safeguard all stakeholders, with particular attention to vulnerable adults.

This policy is formulated in response to pertinent legislation and guidance pertaining to both Safeguarding and Prevent duties including but not limited to the Health and Safety at Work Act 1974, the Safeguarding Vulnerable Groups Act 2006, the Equality Act 2010, the Care Act 2014, and the Data Protection Act 2018. Additionally, it aligns with guidance from the Local Authorities of Brent, Harrow, and Barnet, as well as the Prevent Policies of partner institutions.

LCK Academy provides educational and pastoral support services to adults, defined as individuals aged 18 and above. Within this demographic, some individuals may be vulnerable to various forms of abuse, harm, and neglect, including the potential risk of radicalisation into extremism. Therefore, the primary aim of this policy is to inform students, staff, and stakeholders, including members of the public, about the risks faced by adults and to establish comprehensive procedures for identifying, reporting, preventing, and mitigating all forms of abuse, harm, neglect, as well as involvement in terrorism, or the provision of support for terrorism, radicalisation, and extremism. The following provides the latest definition of extremism by according to the UK Government 2024:

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

1.2. Scope

This policy applies to all stakeholders of LCK Academy (LCKA), including:

- Students over 18 years of age enrolled in any programmes or activities offered by LCKA
- Staff: Full-time, part-time, and temporary employees engaged in roles within LCKA
- Other stakeholders: This includes but is not limited to visitors, guests, and members of the public participating in or visiting LCKA activities or events
- This policy extends to all locations where LCKA delivers services, including its own facilities, partner institutions' premises, excursions, external events, and online communications. It also covers situations that may occur in a student's personal life or home environment

Additionally, this policy applies to individuals who:

- Require care and support
- Are experiencing or at risk of harm or neglect, including physical, mental, emotional, and sexual exploitation, harassment, and abuse
- Are unable to protect themselves from the risk or experience of abuse, harm, or neglect
- May be susceptible to radicalisation and extremism due to vulnerabilities such as mental health issues

2. Aims and Objectives

2.1. Aims

The main aims of this policy are to:

- Promote the welfare of adults and their support needs
- To facilitate and support the Academy's activities involving children, young people, and vulnerable adults
- Ensure that all adults attending courses or participating in any activity of the Academy may thrive in a happy, safe and secure environment
- Enable the Academy and its staff to understand their roles in meeting our statutory responsibility to 'safeguard' the welfare of adults at risk in the Academy and prevent radicalisation into extremism
- Ensure all employees/sub-contractors and other stakeholders including members of the public are made aware of the required procedures to ensure the safeguarding of adults and the prevention of radicalisation into extremism, including the management and reporting of Safeguarding and Prevent concerns
- Identify adults who are in need or suffering/likely to suffer significant harm and take appropriate action to make sure they are safe
- Contribute to effective partnership working between all those involved with providing services for adults at risk with care needs.

2.2. Objectives

The main objectives for achieving the aims of this policy are:

- To treat the welfare and well-being of vulnerable adults as the paramount consideration and make it the focus of any action taken in any conflict of interest
- To treat safeguarding as the responsibility of the whole Academy. Any member of staff who has knowledge or suspicion that an individual is being harmed or is in need must inform the Designated Safeguarding Lead (DSL) who and any other nominated person(s) with responsibility for ensuring these procedures are implemented
- To guide governors, management, tutors, assistants and all other employees/sub-contractors (stakeholders) so they do not put themselves in positions where they could be accused of any form of abuse
- To instruct any stakeholder who sees or hears anything which could be perceived as either poor practice or abuse that they must report the incident to the Designated Safeguarding Lead (DSL) **Ala Uddin**, and/or their deputies (**Ateefa Irshad**).
- To ensure that all stakeholders have an appropriate Disclosure and Barring Service (DBS) checks if they are participating in activities that will bring them into contact with under 18s or adults at risk
- To ensure the Academy has the correct policy and procedures in place and that all staff and those who come into contact with Under 18s or adults at risk have access to the policy and procedures on the Academy website, read and understand the procedures, and sign the declaration to state that they understand the procedures
- To enable staff working with adults at risk to meet these commitments, the Academy will provide and/or require staff to complete appropriate training in Safeguarding and Prevent Duties. Refresher training and recertification will be required every two years. LCKA will keep a record all Safeguarding and Prevent CPD staff training and certification
- To review this policy annually, place it on the Academy website and ensure all staff sign the declaration stating that they have read and understood it
- For all staff to receive guidance and instructions on Academic Safeguarding and Prevent procedures during their induction
- For all staff to receive regular Safeguarding and Prevent updates, with reminders about these procedures and contemporary Safeguarding and Prevent issues
- To carry out pre-employment checks on all staff. For more details see the Safer Recruitment procedures below and the LCKA Safer Recruitment Policy
- A member of the Senior Leadership will carry out background checks on all visitors invited to attend events and interact with any of LCKA's past, present or potential students and complete the external speaker approval form in the Academic Freedom Policy
- To maintain full password protected electronic records of any Safeguarding and Prevent matter dealt with under these procedures

- To work actively in partnership with Brent, Harrow and Barnet Council on all matters relating to Safeguarding and Prevent for any LCKA services or activities delivered in those boroughs

3. Application

3.1. Identifying Vulnerabilities and Potential Abusers

People may be at increased risk of abuse and unable to protect themselves if they:

- depend on other people for their care
- are older, frail, or have limited mobility
- have mental health problems
- have a learning disability
- have a sight or hearing impairment
- have dementia
- misuse alcohol or drugs
- have a long-term illness

LCK Academy expects all stakeholders to recognise that abusers may hide in plain sight, by taking up any job, role or responsibility within the organisation. Abusive behaviour should not be ignored because of who the abuser may be.

3.2. Safeguarding Responsibilities:

- Make staff and students aware of their responsibilities through induction, guidance, support and training, to minimise risk and avoid situations (where possible) where abuse, neglect, or radicalisation might be alleged
- Make clear policies and procedures on Safeguarding and Prevent available on the Academy website, with other policies on conduct for both staff and students in the Student Code of Conduct, Staff Handbook, Staff Disciplinary Policy and the Non-Academic Misconduct Policy
- Continuously review safety and security for everyone studying with the Academy, and raise awareness of Safeguarding and Prevent issues and updates e.g., through posters
- Require staff, visitors and contractors to record their arrival and departure from premises where the Academy is delivering services, and for staff to wear ID badges when on site
- Abide by Safer Recruitment guidelines when employing staff
- Identify individual needs of students during admissions, and provide all students with referrals or access to support services as required
- Have 24/7 access to contact details for Designated Safeguarding Lead (DSO) and/or Safeguarding Officers (SO) as well as Prevent Lead for the Academy and those of any relevant partner institution
- To provide clear escalation processes on what to do if a risk or concern is identified
- To ensure that all external speakers on campus are approved by a member of the Senior Leadership Team.

3.3. Roles and Responsibilities

The following are the roles and responsibilities of Designated Safeguarding and Prevent Lead (DSL) and On-site Safeguarding Officer (SO):

- Monitoring all matters related to Safeguarding and Prevent such as the volume and types of disclosures or allegations
- Compiling reports on Safeguarding and Prevent and responding to any concerns that may arise
- Informing and training all students and staff about Safeguarding and Prevent as detailed in this policy
- Maintain links with the DSL and SO of relevant partner institutions to ensure compliance with their Safeguarding and Prevent Policies and Procedures
- Participate in meetings in order to monitor and review activities and developments
- Reporting any concerns or incidents to the Senior Leadership Team on a quarterly basis
- Reviewing the Safeguarding and Prevent Policy and updating where required to align with the latest legislation and any other changes and to make recommendations to SLT for any required changes to the policy

3.4. Responsibilities of LCKA Staff and Governors:

- Read all relevant policies and procedures in relation to Safeguarding and Prevent and sign the declarations to state that they have read and understood them
- Report any Safeguarding or Prevent concerns to the DSL or SO
- Make use of the Whistleblowing Policy in case they see a concern in relation to another member of staff including senior management

3.5. Responsibilities of Students:

- Provide the Academy with an emergency contact number of someone they can rely upon in times of need on enrolment and re-enrolment at the start of every academic year
- Attend induction and other training on Safeguarding and Prevent provided by the Academy or its partner institutions

3.6. International Students and UKVI Compliance

Should LCKA obtain the appropriate authority to recruit international students then the following section will apply:

LCK Academy (LCKA) is dedicated to safeguarding the well-being of all students, including international students, irrespective of nationality or visa status. In alignment with this commitment, the Academy's Admissions staff, responsible for international compliance, play a pivotal role in ensuring that international students receive appropriate support and guidance.

International students encountering safeguarding issues that may affect their regular attendance or necessitate a study break are encouraged to seek assistance from the LCKA admissions staff responsible for international compliance. These staff members are equipped to provide advice and assistance tailored to the unique circumstances of international students.

In cases where safeguarding concerns intersect with visa compliance matters, the LCKA admissions staff will liaise with UK Visa and Immigration (UKVI) as needed to address the situation effectively. Additionally, international students may be referred to the International Compliance Team of LCKA's partner institution(s) for further support and guidance.

It is imperative for international students to remain informed about any changes in their enrolment status or study progression, as these may have implications for their visa status. The collaboration between international students and the LCKA admissions staff ensures proactive management of safeguarding issues while maintaining compliance with UKVI regulations, thereby fostering a supportive and secure environment for all international students at LCK Academy.

3.7. Governance and Monitoring

The DSL, in addition to reporting to the SLT four times a year, will provide annual safeguarding report to the Senior Leadership Team. The Senior Leadership Team reporting to the Board of Governors is responsible for Safeguarding and Prevent Duty at the Academy.

4. Safeguarding Key Contacts

For any concerns or issues related to safeguarding, please contact the appropriate staff listed below:

Reporting a Safeguarding, Prevent, Sexual Misconduct (or any other) Concern:

Email: safeguarding.prevent@lckacademy.org.uk

Phone: +44 (0)735913573

Safeguarding and Prevent Lead:

LCKA Director of Advancement and
Operations

Email: ala.uddin@lckacademy.org.uk

Phone: +44 (0)7359135732

Deputy Safeguarding and Prevent Lead

LCKA Head of Student Services

Email: ateefa.irshad@lckacademy.org.uk

Phone: +44 (0) 07359882437

In case of emergencies or immediate safeguarding concerns, please contact your local police or emergency services. Remember, it is crucial to report any safeguarding concerns promptly, regardless of whether you are sure about them or not. The DSL and Prevent Lead, Ala Uddin and/or, Head of Student Services Ateefa Irshad will be the Safeguarding and Prevent Officers on site.

5. Students work placements

If students enrolled on a course at the Academy are given work placements, the DSL or SO will liaise with staff at the work placement and ensure the organisation has a Safeguarding and Prevent Policies which provide adequate protection for LCKA placement students. The organisation's policy will be reviewed by the placements team.

6. Reporting a Safeguarding Concern

Safeguarding concerns may arise in various situations, necessitating appropriate reporting methods to ensure the safety and well-being of all involved parties. These concerns can be classified into emergency and non-emergency situations. While emergencies require immediate action to mitigate risks, non-emergency concerns can be reported using various channels outlined below. Regardless of the urgency, individuals are encouraged to report any safeguarding concerns promptly to designated personnel for timely intervention and support. A full flow chart is provided in Appendix 1.

6.1. Emergency Reporting Procedures:

In emergency situations where the safety or well-being of a student or staff member is at immediate risk, follow these steps to report a safeguarding concern:

- **Contact Emergency Services:** Dial 999 without delay if there is an imminent danger to anyone's safety
- **Inform DSL or SO:** After contacting emergency services, promptly notify the DSL or SO of the situation
- **Engage Partner Institution:** If applicable, the DSL or SO should inform the relevant partner institution's security team
- **Provide Detailed Information:** Furnish as much detail as possible when reporting the emergency to designated staff or authorities
- **Comprehensive Reporting:** Submit a detailed incident report using the Safeguarding and Prevent Report Form once the immediate risk is addressed
- **Debrief and Support:** Conduct a debriefing session with involved parties and the DSL or SO to facilitate understanding, learning, and necessary support provision

6.2. Non-Emergency Reporting Procedures:

In non-emergency situations, follow these steps to report a safeguarding concern:

- Identify the Concern: Determine the nature of the suspected or alleged issue, such as abuse, bullying, harassment, or radicalisation
- Choose a Reporting Method:
 - Utilise the Safeguarding & Prevent Report Form: Accessible on the LCKA website, this form allows for anonymous reporting, with concerns promptly addressed by designated personnel
 - Email Communication: Send an email to info@lckacademy.org.uk detailing your concern. Our Designated Safeguarding Lead (DSL) or Safeguarding Officer (SO) will take appropriate actions upon receiving the email
 - Verbal Reporting: Speak to any member of the Academy staff if you prefer to report your concern verbally. They will assist you in raising the issue with the DSL or SO
- Submit a Report: Use the chosen reporting method to submit your concern securely and confidentially
- Respect Confidentiality: Maintain the privacy of all parties involved and share information only with relevant personnel
- Cooperate with Follow-up Actions: Depending on the concern, the Academy may escalate the matter and take further steps, such as investigation or disciplinary measures
- Offer Support: Continuously provide appropriate support within your role to those directly involved in the concern, respecting boundaries and confidentiality
- Compliance and Data Protection: All reporting and processing of personal data must adhere to the requirements of the Data Protection Act 1998 to safeguard privacy and confidentiality.

By following these procedures, individuals can contribute to maintaining a safe and supportive environment within the Academy, ensuring that safeguarding concerns are addressed promptly and effectively.

7. Allegations Without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept by the Designated Safeguarding Lead and Head of Academy Advancement, including any referrals that may have been made to external agencies such as Social Services. This information may be required by external agencies. In consultation with the DSL or SO, the Senior Leadership Team shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary action will be taken. Consideration should be given to offering counselling/support
- Inform the alleged victim if another student is making an allegation on their behalf
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming what action had been taken. In instances where a false allegation is considered vexatious, disciplinary action may be taken, if appropriate.

8. Records

All documents about any allegation must be stored safely by the DSL and there must be a written record that includes details of the allegation and their outcomes. All allegations need to be stored, including those there were found to be vexatious or without foundation.

LCK Academy must inform staff who are dismissed or resign before facing a disciplinary process that the Academy has a statutory duty to inform the Secretary of State for Education under the Independent Safeguarding Authority 'ISA' procedures.

9. Confidentiality

Staff may not commit to confidentiality if a student or other member of staff makes an allegation. Staff will need to be clear that they may be obligated to report an allegation of abuse to the DSL and/or the police or social services.

10. Prevent Duty

LCK Academy upholds key British values that include Democracy, Individual Liberty, Rule of Law and Respect and Tolerance. Any student, staff or other stakeholder who fails to uphold these values or acts in contravention of them must be reported to the **Prevent Lead**, who is also the **Academy DSL** or any of the Prevent or Safeguarding Officers at any campus. The DSL and Prevent Lead reports to the Senior Leadership Team on Prevent Duty.

The following provides the latest definition of extremism according to the UK Government 2024:

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

All potential cases of extremism or radicalisation should be reported to the DSL. Contact details are provided below along with other key contacts in relation to Prevent Duty:

Safeguarding and Prevent Lead:

Ala Uddin, LCKA Director of Advancement and Operations

Email: ala.uddin@lckacademy.org.uk

Phone: +44 (0)7359135732

Local Authority Prevent Duty Adult Safeguarding:

Brent Email: prevent@brent.gov.uk.

Harrow Email: AHadults@harrow

Harrow Phone: 020 8901 2680

Barnet Email: BarnetCST@barnet.gov.uk

11. External Speakers and Events

The Academic Freedom and Freedom of Speech Policy should be referred to for details on how to comply with Prevent duty when inviting external speakers to the Academy. Procedures regarding external speakers in the Academic Freedom and Freedom of Speech Policies apply to all staff, students and visitors and clearly set out what is required for any event to proceed. This includes events organized by the Academy in its own premises or in any other premises.

12. Radicalisation of Students

Students who have been radicalised may spread extremism to other students in person or through social media. LCK Academy staff or students who notice signs of possible radicalisation should, therefore, report this to the DSL or Safeguarding Officer, who may then conduct an assessment and report the findings to the Senior Leadership Team. All reports must also be shared with the Board of Governors.

The Academy carries out an annual self-assessment of risk in relation to Safeguarding and Prevent that includes the risk of radicalisation of students and staff through in-person contact and social media. The self-assessment includes a review of Safeguarding and Prevent duty staff training to ensure that staff are able to recognise signs of radicalisation and know how to report them appropriately. It also reviews the support provided for student wellbeing.

13. Partnership

The Board of Governors and the Senior Leadership Team will communicate with the following agencies in relation to any concerns about Safeguarding and Prevent if required:

- The Police
- Bureau of Industry and Security BIS regional higher and further education Prevent coordinator

The Academy affirms that it will ensure:

- It consults with student representatives on the implementation of the Prevent duty
- There is a Prevent Lead responsible for managing activities in relation to Prevent

14. Risk assessment

The DSL will keep records of risk assessments on the likelihood that students, staff and other stakeholders may be involved in terrorism and that they can be prevented from this with early intervention if possible. This risk assessment will be part of the Academy's overall assessment of Safeguarding and Prevent, student welfare and policies on Equality and Diversity, Student Complaints and Whistleblowing. There will also be individual risk assessments carried out for any events organised by the Academy at its own premises or in the premises of other organisations.

15. Staff Training

All key staff including faculty will be required to complete Safeguarding and Prevent training. The Prevent Lead will ensure that this training takes place and the HR Manager will ensure that digital copies of Safeguarding and Prevent training certificates are stored.

Training should include making staff aware of the signs that indicate possible terrorism and extremism. It should also ensure that staff understand what makes people susceptible to terrorism or extremism and the arguments that may be used to justify acts of violence. Staff should also know what steps they should take if they see signs of extremism and when they need to make a referral to the [Channel programme](#) or contact someone for advice and guidance.

16. IT Policy in Relation to Prevent Duty

The Academy uses filtering to prevent students from exposure to online content that may draw them into extremism. The Academy does not permit any research on its IT equipment into terrorism or extremism.

17. Appendices:

17.1. Appendix 1 Safeguarding and Prevent Steps

Steps	Suspected harm, abuse or radicalisation	
1	Emergency	Non-Emergency
	Inform the Police 999	
2	Inform the DSL or SO.	Inform the DSL or SO.
3	Refer to relevant support services if necessary	
4	Inform the LCKA Senior Leadership Team	
5	Contact partner institution security	
6	Complete the Safeguarding and Prevent Report Form	
	An allegation by a student or staff member Either by email or as a complaint via the Academy's complaints process.	
1	Follow all the steps above	
2	The process that follows an allegation is explained to the person making the allegation by the Designated Safeguarding Lead or Safeguarding Officer	
3	The Senior Leadership Team is informed	
4	The person being accused should be informed about the allegation against them and the process that will take place	
5	All records of allegations and actions taken must be stored by the DSL or SO	
6	Police or other agencies may be contacted by the DSL or SO and detailed information provided to the Police or other agencies by the DSL or SO	
7	Suspension may be considered at any stage. It is a neutral position, not a disciplinary act and shall be introduced with full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties. Suspension should only occur for a good reason. For example: • where a student is at risk • where the allegations are potentially serious enough to justify dismissal on the grounds of gross misconduct • where it is necessary for the good and efficient conduct of the enquiry	

	Prior to making the decision to suspend, the Senior Leadership Team should interview the member of staff. This should occur with the approval of the appropriate agency. If the police are engaged in an investigation, the officer in charge of the case should be consulted.
8	During the interview, the member of staff should be given as much information as possible, especially the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but to give an opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.
9	If the Senior Leadership Team considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within one working day.

17.2. Appendix 2 Definitions

Child	Any person under the age of 18 according to the Children Act 1989.
Child abuse	This includes physical, verbal, emotional harm and neglect.
Emotional abuse	This is all forms of abuse that affect someone's self-esteem and mental wellbeing.
Neglect	Failure to provide someone with the support they may depend upon in order to meet their physical needs. It refers to vulnerable people with needs, including adults with disabilities.
Physical abuse	All forms of violence against another person that may cause them physical harm.
Sexual Abuse	This includes all forms of inappropriate physical contact or verbal communication. It may also include such things as upskirting or forcing someone to participate in sexual activity against their will.
Risk to self and/or others	Signs that someone may be prone to self-harm, including suicidal tendencies.
Adult at Risk	Anyone over the age of 18, who may be at risk due to a disability or learning difficulty or hardship and who may be subject to neglect or abuse.

17.3. Appendix 3 Safeguarding and Prevent Report Form

Person completing the form (this will remain confidential although the authorities will be informed if requested)	
Date/Time	
Person reporting the concern or suspicion	
Key people involved	
Referral to an external organisation such as the Police	