



Safeguarding

Policy and Procedures 2021-2022

Safeguarding and E&D Manager

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1. Introduction

- 1.1 City of Wolverhampton College acknowledges the duty of care to safeguard and promote the welfare of students, apprentices and staff and is fully committed to ensuring safeguarding practice reflects statutory responsibilities and government guidance.
- 1.2 The College is committed to maintaining procedures and practices which safeguard and promote the welfare of all students, apprentices and staff by ensuring the Safeguarding Policy and Procedure meets the requirements set by the Department for Education's statutory guidance for Colleges, 'Keeping Children Safe in Education'.
- 1.3 Keeping Children Safe in Education 2021 defines safeguarding and promoting the welfare of children as:
 - protecting children from maltreatment
 - preventing impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes.
- 1.4 Children includes everyone under the age of 18.

2. Purpose

- 2.1 The purpose of the Safeguarding Policy and Procedure is:
 - To protect students and apprentices who study at City of Wolverhampton College from harm
 - To provide staff, volunteers, employers, contractors as well as students, apprentices and their families, with the overarching principles that guide our approach to safeguarding.
- 2.2 The Safeguarding Policy and Procedures recognises that the welfare and interest of students, apprentices and staff are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or social-economic background, all students, apprentices and staff have a positive and enjoyable experience at City of Wolverhampton College in a safe and welcoming environment.
- 2.3 The College acknowledges that some students and apprentices, including those with disability or those from ethnic minority communities, can be particularly vulnerable to abuse and the College accepts the responsibility to take reasonable and appropriate steps to ensure their welfare.

3. Scope

- 3.1 The Safeguarding Policy and Procedures are mandatory for everyone involved in City of Wolverhampton College. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal or exclusion from the organisation.
- 3.2 This applies to anyone working on behalf of City of Wolverhampton College, including Governors, Senior Managers, Volunteers, Agency staff and College employed apprentices.
- 3.3 Safeguarding and promoting the welfare of students and apprentices is everyone's responsibility. Everyone who comes into contact with students and apprentices and their families has a role to play. In order to fulfil this responsibility effectively, all staff should make sure their approach is student and apprentice centred. This means that they should consider, at all times, what is in the best interest of the student or apprentice.

4. College arrangements

4.1 City of Wolverhampton College believes that:

- Students and apprentices should never experience any kind of abuse or neglect
- The College has a responsibility to promote the welfare of all students and apprentices, to keep them safe and to practise in a way that protects them.

4.2 City of Wolverhampton College will ensure that:

- Ways of reporting or seeking help will be widely known by students and apprentices and is always accessible
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- Safer recruitment, selection and pre-employment vetting of staff and volunteers is conducted in accordance with College policy
- Robust safeguarding arrangements and procedures are in operation and reviewed on an annual basis.

4.3 The College's Governing Body will ensure:

- A Governor is appointed and is designated to take lead responsibility for safeguarding
- The Chair of the Board of Governors/designated Governor is responsible for liaising with the Local Authority Designated Officer (LADO) and partner agencies in the event of allegations of abuse being made against the Principal
- A member of College's Executive Management Team (EMT) is assigned as the College Designated Safeguarding Lead

- The College has a Safeguarding Policy and Procedure in place that is in accordance with statutory guidance provided by the Department for Education 'Keeping Children Safe in Education'
- The College operates safer recruitment, selection and pre-employment vetting of staff and volunteers and is conducted in accordance with College policy
- The College has fair and robust procedures in place for dealing with allegations of abuse against staff and volunteers
- The College identifies those who are suffering or likely to suffer significant harm or who are at risk of radicalisation
- The College ensures all staff are appropriately trained to discharge their duties in relation to safeguarding
- The College works with Social Care, Police, Health Services and other services to promote the welfare of students and apprentices and protect them from harm
- The College allows access for children's social care from Wolverhampton local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct a section 47 assessment
- Where services or activities are provided on the College premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding and liaises with the College on these matters where appropriate.

4.4 The College's Designated Safeguarding Lead is responsible for:

- An appointment of a Deputy to support in duties (optional)
- Ensure ways of reporting or seeking help are widely known by students and apprentices and are accessible
- Referral of all cases of suspected abuse to local authority Social Care Services as required
- Referral of all cases to the Channel where there is a radicalisation concern as required
- Referral of all cases where a person is dismissed or left due to risk or harm to a child to the Disclosure and Barring Service as required
- Referral of all cases where a crime may have been committed to the Police as required
- Keeping of detailed, accurate, secure written record of concerns and referrals
- Liaison with the Principal to inform of issues, especially ongoing enquiries under section 47 of the Children Act (1989) and police investigations
- Lead and support the Principal and Head of HR when dealing with allegations against staff
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding when deciding whether to make a referral by liaising with relevant agencies
- Ensuring the Safeguarding Policy and Procedure are reviewed annually, working with Governors to approve and are published
- Liaising with schools and academies to ensure safeguarding concerns have appropriate arrangements in place to support when students or apprentices transfer to the College

- Liaising with employers and training organisations who support with long term work placements to ensure that appropriate safeguards are put in place
- Ensuring staff receive training in safeguarding and are aware of the College Safeguarding Policy and Procedures
- Working in partnership with the local authority and Wolverhampton Safeguarding Together (WST) and other appropriate agencies
- Providing an annual Safeguarding Report to Governors setting out how the College has discharged its duties. Where necessary, will report deficiencies in procedure or policy identified by the WST (or others) at the earliest opportunity.

4.5 The College Safeguarding Team are responsible for:

- Dealing with individual cases, including attending case conferences and review meetings as appropriate
- Making appropriate safeguarding referrals to multi agency safeguarding hub (MASH) or police
- Providing support and liaise with staff for any safeguarding concerns within College times
- Particular responsibility to be available to listen to students and apprentices and help them voice their concerns.

4.6 All College staff must:

- Report all matters via the referral system or advise the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, a member of the Safeguarding Team or the Principal relating to any safeguarding issue or concern
- Complete training as legislation changes and complete refresher training at least every three years.

4.7 City of Wolverhampton College recognises that:

- Staff have a responsibility to provide a safe environment in which students and apprentices can learn and work
- Staff should be prepared to identify students or apprentices who may benefit from early help. Early help means providing support as soon as a problem emerges
- Any staff member who has a concern about a student's or apprentice's welfare should follow the referral processes set out in in this policy
- Staff understand their roles and responsibilities in respect of safeguarding and will be provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to students or apprentices
- Staff in the first instance will discuss any potential safeguarding referral with the Safeguarding Team about a student's or apprentice's welfare
- If required, staff will be supported to make an appropriate referral to the Wolverhampton Multi Agency Safeguarding Hub (MASH)/Police or any other external relevant agency
- Staff are expected to support Social Workers and other agencies following any safeguarding referral

- Staff should be particularly alert to the potential need for early help for a student or apprentice who:
 - is disabled and has specific additional needs
 - has special educational needs (whether or not they have a statutory EHCP)
 - is a young carer
 - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - is frequently missing/goes missing from care or from home
 - is at risk of modern slavery, trafficking or exploitation
 - is at risk of being radicalised or exploited
 - is in a family circumstance presenting challenges for the student/apprentice, such as drug and alcohol misuse, adult mental health issues and domestic abuse; or is misusing drugs or alcohol themselves
 - has returned home to their family from care
 - is a privately fostered child.

4.8 All staff should be aware that students or apprentices can abuse each other (often referred to as peer-on-peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments e.g. making lewd comments or sexualised remarks about a person's clothes or appearance, using sexualised names etc.
- physical behaviours e.g. deliberately brushing against someone, interfering with clothing, displaying pictures, drawings or photos of a sexual nature
- up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages and sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals.

4.8.1 Peer-on-peer abuse tends to be more prevalent amongst boys than girls and often manifests itself differently. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

4.8.2 Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. SEND or LGBT students and apprentices are more likely to be victims of these types of abuse.

4.9 All staff should be aware of indicators, which may signal that a student or an apprentice is at risk from, or are involved with serious violent crime. These may include:

- increased absence from College
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that students/apprentices have been approached by, or are involved with, individuals associated with criminal networks or gangs.

4.10 All staff need to be aware that mental health problems can, in some cases, be an indicator that a student or apprentice has suffered or is at risk of suffering abuse, neglect or exploitation.

4.11 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these experiences can impact on a students or apprentice's mental health, behaviour and education.

4.12 Staff should not attempt to make a diagnosis of a mental health problem. If staff identify a student or apprentice whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, they should discuss their concerns with the Safeguarding Team.

5. Named Contact Details (internal)

Name	Title	Contact Details
Louise Fall	Designated Safeguarding Lead Vice Principal Student Engagement	☎ 01902 317714 ✉ fall@wolvcoll.ac.uk
Anil Sharma	Deputy Designated Safeguarding Lead Safeguarding & Equality Manager	☎ 01902 317575 ☎ 07534 558517 ✉ sharman@wolvcoll.ac.uk
Jas Bhangi	Safeguarding Officer	☎ 01902 317696 ☎ 07534 558510 ✉ bhangij@wolvcoll.ac.uk
Sam Marchant	Safeguarding Officer	☎ 01902 821122 ☎ 07534 558514 ✉ marchants@wolvcoll.ac.uk

Name	Title	Contact Details
Dandol Juman-Sygrove	Safeguarding Apprentice Pastoral Support	☎ 01902 317696 ☎ 07534558752 ✉ jumand@wolvcoll.ac.uk
Mary Carter	For allegations against staff only Head of Human Resources	☎ 01902 821230 07919 111518 ✉ carterm@wolvcoll.ac.uk
Clarence Crosdale	Designated Safeguarding Governor	✉ crosdalec@wolvcoll.ac.uk

6. Named Contact Details (external)

Contact	Details
Local Authority Safeguarding Officer (LADO)	Local Authority Safeguarding Officer (LADO) Wolverhampton City Council Priory Green Office Whitburn Close Pendeford Wolverhampton WV9 5NJ ✉ LADO@wolverhampton.gov.uk Secure ✉ LADO@secure.wolverhampton.gov.uk ☎ 01902 550661
Multi-Agency Safeguarding Hub (MASH)	To report any concerns about a child's safety or wellbeing telephone (01902) 555392. This is the number for the MASH. Early Help and Social Care staff in the MASH will carry out a range of information checks to see what if any additional information there is in partners' files to ensure the best possible picture of the family is used to inform decisions about keeping children safe and the sort of help and support the family might need. Don't forget, if you aren't sure whether or not to call the MASH - just do it: always do something rather than nothing! The experienced staff in the MASH will be more than happy to talk through your concerns and help decide on the best way forward. Once a telephone referral has been made, the member of staff making the referral must complete and submit the online Multi Agency Referral Form the MASH within 24 hours. If you have any technical problems with completing the online Multi-Agency Referral Form (MARF) please contact the MASH on 01902 555392 for advice.
Police Central Referral Unit	☎ 0345 1135 000 If immediate action is needed ☎ 999

Contact	Details
Prevent Officer James Sommers	West Midlands CTU West Midlands Police ☎ 0753455817 ✉ j.somers@west-midlands.pnn.police.uk If immediate action is needed ☎ 999
Prevent & Cohesion Officer Deborah Smith	☎ 07870407063 ✉ Deborah.Smith@wolverhampton.gov.uk

7. Safeguarding Procedures

7.1 How to respond if a student or an apprentice tells you about possible abuse:

7.1.1 If a student or apprentice has suffered or is likely to suffer harm contact a member of the Safeguarding Team, Designated Lead or Deputy, see Annex B for a procedure flowchart.

7.1.2 When a student or an apprentice makes a disclosure:

- never promise confidentiality
- explain that you will have to share information with others who would be able to help and will only disclose to others who need to know
- tell them to whom you are going to inform of your concerns
- listen carefully and stay calm
- you need to listen without making assumptions or judgements
- do not interview the person, but question normally and without pressure, in order to be sure that you understand what s/he is telling you
- make sure that you do not use leading questions or suggest words
- reassure the person by telling them, they have done the right thing
- make note of key information the date, time, place and what the person said. Use the Safeguarding Report Form if practical to do so, see Annex C for an example of the referral form
- ensure confidential records will be kept of the disclosure and will be stored electronically or in a locked cabinet in a confidential manner
- make sure student's or apprentice's wishes will be taken into account when determining what action is to be taken
- do not investigate concerns or allegations yourself, contact the Safeguarding Team. In this instance, the Safeguarding Team member will consult the student or apprentice regarding the disclosure.

7.2 How to respond if a student or apprentice is at risk of significant harm:

7.2.1 Where a student or apprentice is suffering, or is likely to suffer from significant harm, it is important that a referral to social care (and if appropriate the police) is made immediately. Anybody can make a referral.

- 7.2.2 The Safeguarding Team should be informed, as soon as possible if a referral has been made.
- 7.2.3 There should be no delay in seeking immediate guidance about referring a student or apprentice that is considered to be at immediate risk of harm, see Annex A for explanations to terms useful and information of potential risk.
- 7.3 If this is related to a student aged between 14-16 years old:
- 7.3.1 Where applicable, the Head of Faculty responsible for 14-16 provision will work collaboratively with the appropriate local authority/school in order to share information about the attendance and/or absences of a student as the local authority deems necessary.
- 7.3.2 The Head of Faculty responsible for 14-16 provision will inform the relevant local authority immediately if a student is removed from College roll so that the local authority can, as part of their duty, identify children of compulsory school age who are missing education.
- 7.3.3 Where an allegation, suspicion or incident is reported, the Head of Faculty will notify the head teacher of the school the student is from or other senior manager with safeguarding responsibility of the relevant local authority or school as soon as possible. This action can also be carried out by the curriculum manager or Designated Safeguarding Lead.
- 7.3.4 In all other respects, such allegations suspicions or incidents will be managed in accordance with the College's Safeguarding Policy and Procedure.
- 7.3.5 The Head of Faculty responsible for 14-16 provision will ensure all participating schools and the local authority have signed up to the partnership agreement which includes safeguarding practice, notification of vulnerability, travel arrangements, attendance monitoring/reporting and out of class supervision.
- 7.3.6 All students on school links programme who make a safeguarding disclosure must be referred to the Designated Safeguarding Lead at the relevant school to be actioned under their safeguarding procedures. This will be completed by the Head of Faculty responsible for 14-16 provision or the College's Designated Safeguarding Lead.

8. Prevent Duty Procedures

- 8.1. City of Wolverhampton College is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of its functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.
- 8.2. The Prevent duty responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views. It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support. It works with a wide range of sectors

(including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation. It covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism, see Annex A.

- 8.3. If anyone has concerns regarding a student or apprentice becoming radicalised or is involved in an organisation which could place our students or apprentices at risk of being radicalised this needs to be reported immediately to the Safeguarding Team or their Line Manager.
- 8.4. The concerns raised will be assessed by the Designated Safeguarding Lead who will then make the decision to contact the police or make a referral to Channel.

9. Supporting Employers engaged in Work Experience and Apprenticeships

- 9.1. Employers offering training opportunities to students or apprentices will receive a copy of the Safeguarding Policy and Procedure, and information relating to their responsibility for safeguarding.
- 9.2. Assessors, trainers or placement officers will conduct risk assessments and include safeguarding & prevent elements as part of workplace reviews with students and apprentices.
- 9.3. Staff must report when they are made aware of any allegations, suspicions or incidents involving students or apprentices on employer's premises.
- 9.4. All students and apprentices will receive information relating to safe practices in the workplace and the Safeguarding Team contact details.

10. Confidentiality

- 10.1. In any safeguarding matter, the welfare of the student/apprentice is paramount. Only a restricted number of people within the College will have access to information that involves such incidents. Information will be shared on a '*need to know*' basis, see Annex D.
- 10.2. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

11. Position of Trust

- 11.1. All adults working with students and apprentices are in a position of trust in relation to these students and apprentices.
- 11.2. A relationship between staff, volunteer or contractor and a student or an apprentice cannot be a relationship between equals. There is potential for exploitation and harm of the student or apprentice, and all staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage.

- 11.3. Under the Sexual Offences Act (2003) it is an offence for a person over 18 (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if s/he does not teach the child.
- 11.4. Staff should avoid behaviours which might be misinterpreted by others and adhere to the staff code of conduct, see Annex E.

12. Allegations of abuse made against staff

- 12.1. These procedures apply to all staff, agency and supply staff as well as to volunteers and should be followed in respect of all cases in which it is alleged that a member of staff who would pose a risk of harm to children when they have:
- behaved in a way that has harmed a child, or may have harmed a child
 - possibly committed a criminal offence against or related to a child
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 12.2. City of Wolverhampton College recognises as an employer it has a duty of care to all its employees. Any allegation of abuse made against staff will be dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time support the person who is the subject of the allegation.
- 12.3. All allegations will be investigated in accordance with the College Disciplinary and Capability Policy and the Safeguarding Policy and Procedure, as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation.
- 12.4. When an allegation is made, the College will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- 12.5. The Designated Safeguarding Lead has overall responsibility for dealing with allegations and for liaison with the third parties and will be supported by the Head of HR. In some cases, this may also include the Principal. Where the College is not the direct employer, it will ensure allegations are dealt with appropriately and that they liaise with relevant parties.
- 12.6. Where the Principal is the subject of an allegation the Chair of Governors will discuss the allegation immediately with the Designated Safeguarding Lead. The Designated Governor Lead may also be consulted. The Head of HR will be consulted and agree a course of action.

- 12.7. The allegation may require immediate intervention by Wolverhampton Social Care Services and/or the Police. The Local Authority Designated Officer (LADO) will be informed of all allegations and will consult with police and Social Care Services as appropriate.
- 12.8. In this instance, the Designated Safeguarding Lead will take advice from the LADO, Police and Social Care Services to agree the following:
- who needs to know and importantly, exactly what information can be shared
 - how to manage speculation, leaks and gossip
 - what, if any, information can be reasonably given to the wider community to reduce speculation; and how to manage press interest if and when it should arise.
- 12.9. There may be situations when the Designated Safeguarding Lead will want to involve the police immediately if the member of staff concerned is deemed to be an immediate risk to students or apprentices or there is evidence of a possible criminal offence.
- 12.10. The staff member will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the Social Care Services or Police. The individual will be advised to contact their Trade Union representative, if they have one, or a colleague for support. They will also be given access to welfare support via the College.
- 12.11. Parents or carers of the student or apprentice involved will be told about the allegation as soon as possible. However, where a strategy discussion is required, or Police or Social Care Services need to be involved, Designated Safeguarding Lead or the Head of HR will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers.

13. Suspension

- 13.1. The College will carefully consider whether the circumstances of the incident will warrant the member of staff being suspended from contact with students/apprentices or whether alternative arrangements can be put in place until the allegation or concern is resolved. The following alternatives could be considered before suspending a member of staff:
- Redeploying the member of staff to a different campus
 - Redeploying the member of staff to another role
 - Redeployment within the College so that the member of staff does not have direct contact with students or apprentices
 - Provision of supervision when the member of staff has contact with students or apprentices
 - Adapting the student or apprentice learning to avoid contact.
- 13.2. The Designated Safeguarding Lead will also consider the potential professional reputational damage to the member of staff.

- 13.3. The Designated Safeguarding Lead will also consider the potential reputational damage to the College.
- 13.4. If there are concerns about the welfare of other children in the community or the member of staff's family, these concerns will be reported to the LADO or the Police by the Designated Safeguarding Lead(s) who will advise on whether a suspension should be considered.
- 13.5. An Executive Management Team (EMT) member with delegated powers from the Principal will carry out the suspension based on the informed decision of the Designated Safeguarding Lead.
- 13.6. When it has been deemed appropriate to precautionary suspend the member of staff, written confirmation will be provided within one working day outlining the reasons for suspension, without unreasonable delay.
- 13.7. The Head of HR will appoint a named HR member to be the point of contact for the staff member who is the subject of the allegation, and will be responsible for keeping the staff member informed of the progress of the case and will provide further consideration of other support. Access to all College IT systems will be suspended during this time. The staff member will only be permitted to contact their HR point of contact and their Union Representative once precautionary suspended.

14. Dealings with allegations

- 14.1. All dealings will be applied with common sense and judgement. This may form a series of meetings to discuss.
- 14.2. The initial sharing of information between the Designated Safeguarding Lead and LADO may lead to a decision that no further action is to be taken with regards to the staff member facing the allegation or concern; in which case this decision and justification for it will be recorded by the Designated Safeguarding Lead.
- 14.3. Parents or carers will also be kept informed about the progress of the case but will be made aware of the requirement to maintain confidentiality about any allegations made against staff whilst investigations are ongoing, as set out in section 141F of the Education Act 2002 (see paragraphs 233-234). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

15. Dealings with outcomes

- 15.1 Every effort will be made to reach a conclusion in all cases of allegations bearing on the safety or welfare of students or apprentices, including any in which the person concerned refuses to co-operate with the process.
- 15.2 The accused member of staff will be given a full opportunity to answer the allegation and make representations about it, however the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be

substantiated on the basis of all the information available, will continue even if that cannot be done or the accused member of staff does not co-operate.

- 15.3 It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a staff member's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.
- 15.4 Once an outcome is reached, the following definitions will be used when determining the outcome of allegation:
- Substantiated: there is sufficient evidence to prove the allegation
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
 - False: there is sufficient evidence to disprove the allegation
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- 15.5 If the allegation is substantiated and the member of staff is dismissed or the College ceases to use the member of staff, or otherwise ceases to provide his or her services, the Designated Safeguarding Lead will seek advice from LADO regarding making a referral to DBS.
- 15.6 There is a legal requirement for the College as an employer to make a referral to the DBS where the College thinks that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.
- 15.7 Following a criminal investigation or prosecution, the police have decided to close the investigation without charge, or not to continue to prosecute the case after the person has been charged - the Designated Safeguarding Lead will seek advice from LADO whether any further action including disciplinary action is appropriate.
- 15.8 If an allegation is shown to be deliberately invented or malicious, the Designated Safeguarding Lead will consider whether any disciplinary action is appropriate against the student/apprentice who made the malicious allegation, or whether the police should be contacted to consider if action might be appropriate against the person responsible, even if he or she was not a student/apprentice.
- 15.9 Where it is decided that a member of staff who has been suspended can return to work, the Designated Safeguarding Lead and Head of HR will consider how best to facilitate that. Depending on the individual's circumstances, a phased return with support in the short term may be appropriate. The Designated Safeguarding Lead will consider how the person's contact with students/apprentices can be best managed.

- 15.10 If the accused member of staff or volunteer ceases to provide their services, this will not prevent an allegation being followed up in accordance with this policy and procedure. The College will not reach a settlement or compromise agreement.
- 15.11 Parents or carers will be contacted to confirm that an appropriate sanction has been awarded, but no details of the sanction would be shared. They may also be informed if the case was dismissed if there was no case to answer. The deliberations of a disciplinary hearing and the information taken into account in reaching a decision will not be disclosed.
- 15.12 For all allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, any action taken and decisions reached, is kept on a confidential personal file of the member of staff. Copies would be provided to the member of staff.
- 15.13 Outcomes of allegations may be shared as part of references provided by the College. Allegations against staff or volunteers which were proven false, unsubstantiated or malicious should not be included in any references, provided by the College.

Annex A - Indicators of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities 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 a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child 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, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Other safeguarding issues all staff should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the County lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into County lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as County lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the County lines network.

One of the ways of identifying potential involvement in County lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ should be considered. If a child is suspected to be at risk of or involved in County lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of County lines exploitation.

Further information on the signs of a child's involvement in County lines is available in guidance published by the [Home Office](#).

Domestic abuse: The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Female Genital Mutilation (FGM)

Whilst all staff should speak to the designated Safeguarding Lead (or Deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Peer-on-peer abuse (child-on-child)

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse), and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse they should speak to their designated Safeguarding Lead (or Deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
 - upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
 - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage) (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or Deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter

into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmf@fco.gov.uk.

Preventing radicalisation: Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a school's or college's safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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

The school's or college's Designated Safeguarding Lead (and any Deputies) should be aware of local procedures for making a Prevent Referral.

The Prevent duty: All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of school's or college's wider safeguarding obligations. Designated Safeguarding Leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Sexual violence: It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent: Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

For further advice, the links below will provide information from government website:

[Child sexual exploitation \(CSE\)](#)

[Bullying including cyberbullying](#)

[Domestic-violence-and-abuse](#)

[Drugs](#)

[Fabricated-or-induced illness](#)

[Faith-or-belief](#)

[Female-Genital-Mutilation \(FGM\)](#)

[Forced-marriage](#)

[Youth violence and gang involvement](#)

[Violence-against-women-and-girls](#)

[Mental-health](#)

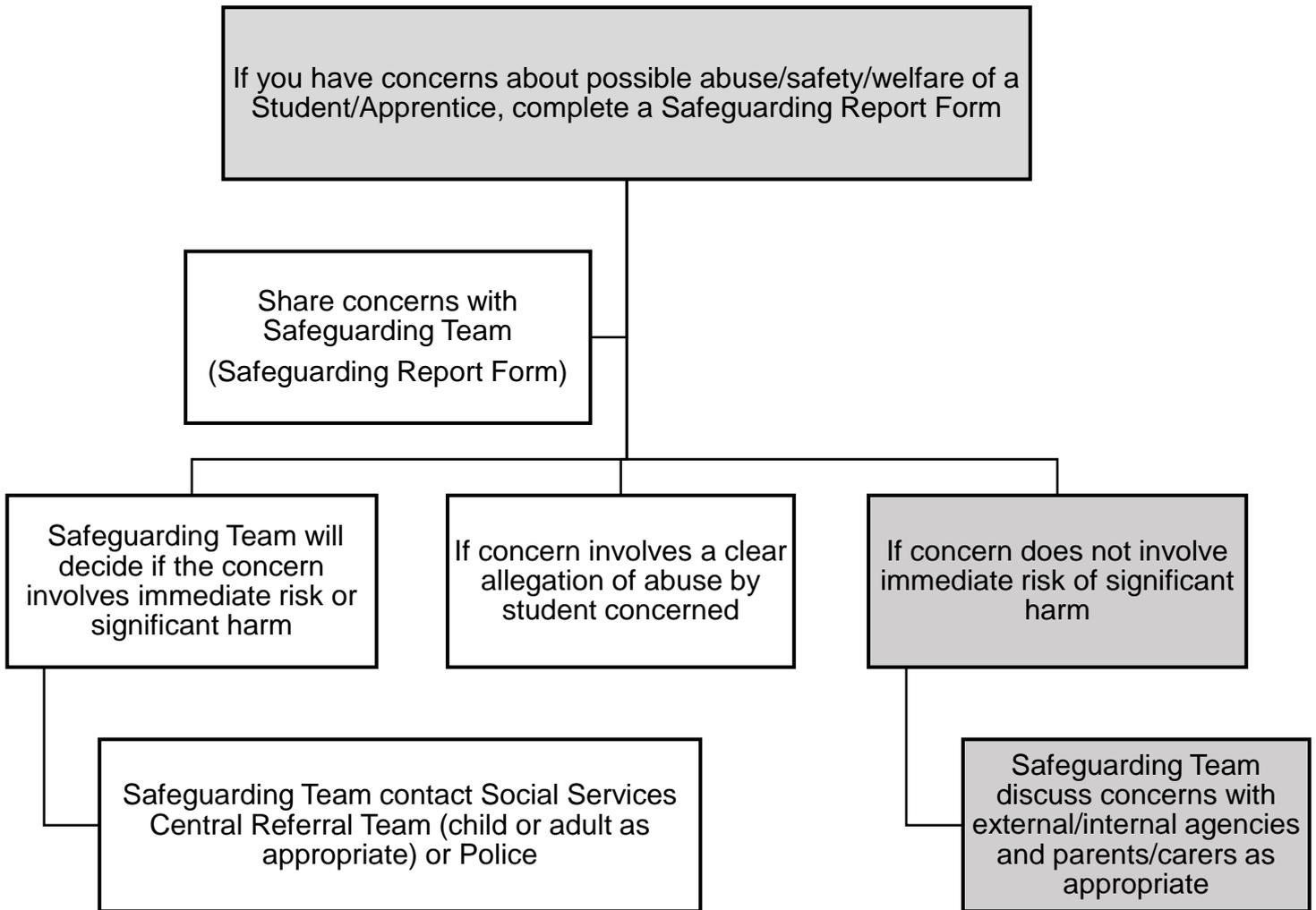
[Private-fostering](#)

[Preventing radicalisation](#)

[Teenage relationship abuse](#)

[Trafficking](#)

Annex B - City of Wolverhampton College Safeguarding Procedure



Safeguarding Team contact details:
 Anil Sharma 07534 558517
 Jas Bhangi 07534 558510
 Sam Marchant 07534 558514
 Dandol Juman-Sygrove 07534 558752
 ☎ 01902 317575
 ✉ safeguarding@wolvcoll.ac.uk

Annex C

SAFEGUARDING REPORT FORM

RESTRICTED (when completed)

To be completed by the staff member making the referral to the College Safeguarding Team

STAFF INFORMATION	Name of Staff: <input type="text"/>	School: <input type="text"/>		
	Campus: <input type="text"/>	Dept: <input type="text"/>		
	Date: <input type="text"/>	Time: <input type="text"/>		
	Telephone No: <input type="text"/>	Email: <input type="text"/>		
LEARNER INFORMATION	Learner Name: <input type="text"/>	Learner ID: <input type="text"/>	Date of Birth: <input type="text"/>	Age: <input type="text"/>
	Gender Male <input type="checkbox"/> Female <input type="checkbox"/>	Adult at risk of harm Yes <input type="checkbox"/> No <input type="checkbox"/>	Has the Learner got a disability? Yes <input type="checkbox"/> No <input type="checkbox"/>	
	Address <input type="text"/>			
	Learner's Telephone Number (Home) <input type="text"/>			
	Learner's Number (Mobile) <input type="text"/>			
	Learner Ethnicity			
	<input type="checkbox"/> African	<input type="checkbox"/> Indian	<input type="checkbox"/> Pakistani	<input type="checkbox"/> White/Asian
<input type="checkbox"/> Arab	<input type="checkbox"/> Irish White	<input type="checkbox"/> White/Black Caribbean	<input type="checkbox"/> White British	<input type="checkbox"/> Any Other
<input type="checkbox"/> Bangladesh	<input type="checkbox"/> Other Asian	<input type="checkbox"/> White/ Black Caribbean	<input type="checkbox"/> White British	<input type="checkbox"/> Any Other
<input type="checkbox"/> Caribbean	<input type="checkbox"/> Other Black	<input type="checkbox"/> White/ Black Caribbean	<input type="checkbox"/> White British	<input type="checkbox"/> Any Other
<input type="checkbox"/> Chinese	<input type="checkbox"/> Other Mixed	<input type="checkbox"/> White/ Black Caribbean	<input type="checkbox"/> White British	<input type="checkbox"/> Any Other
<input type="checkbox"/> Gypsy or Irish Traveller	<input type="checkbox"/> Other White	<input type="checkbox"/> White/ Black Caribbean	<input type="checkbox"/> White British	<input type="checkbox"/> Any Other
INCIDENT INFORMATION	Summary of facts (what the learner said, the staff member observed, what the person(s) accompanying the learner said /similar or past incidents involving the learner(s))			
	<input type="text"/>			

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LEARNER CONSENT	Is the learner aware that this referral is being made	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	If no please state reason(s)		
	<div style="border: 1px solid black; height: 40px;"></div>		
	Learner's feelings regarding what they would like to happen as a result of the disclosure (if appropriate)		
<div style="border: 1px solid black; height: 40px;"></div>			
Learner Signature (Typed Name Accepted)		<div style="border: 1px solid black; width: 100%;"></div>	

Once you have submitted the 'Safeguarding report form.' Please do not save



FOR OFFICE USE ONLY	TO BE COMPLETED BY THE SAFEGUARDING TEAM			
	Name	<div style="border: 1px solid black; width: 100%;"></div>		
	Date/Time Referral Received	Date <div style="border: 1px solid black; width: 100%;"></div>	Time <div style="border: 1px solid black; width: 100%;"></div>	
	Date/Time of Action	Date <div style="border: 1px solid black; width: 100%;"></div>	Time <div style="border: 1px solid black; width: 100%;"></div>	
	Summary of Action Taken			
	<div style="border: 1px solid black; height: 80px;"></div>			
	Designated Person (DP) Informed	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Date <div style="border: 1px solid black; width: 100%;"></div>
	Designated Person	<div style="border: 1px solid black; width: 100%;"></div>	Safeguarding Officer	<div style="border: 1px solid black; width: 100%;"></div>
Type of Referral	Child Protection <input type="checkbox"/>	Welfare <input type="checkbox"/>	Adult at Risk <input type="checkbox"/>	

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Annex D

Seven golden rules for information sharing:

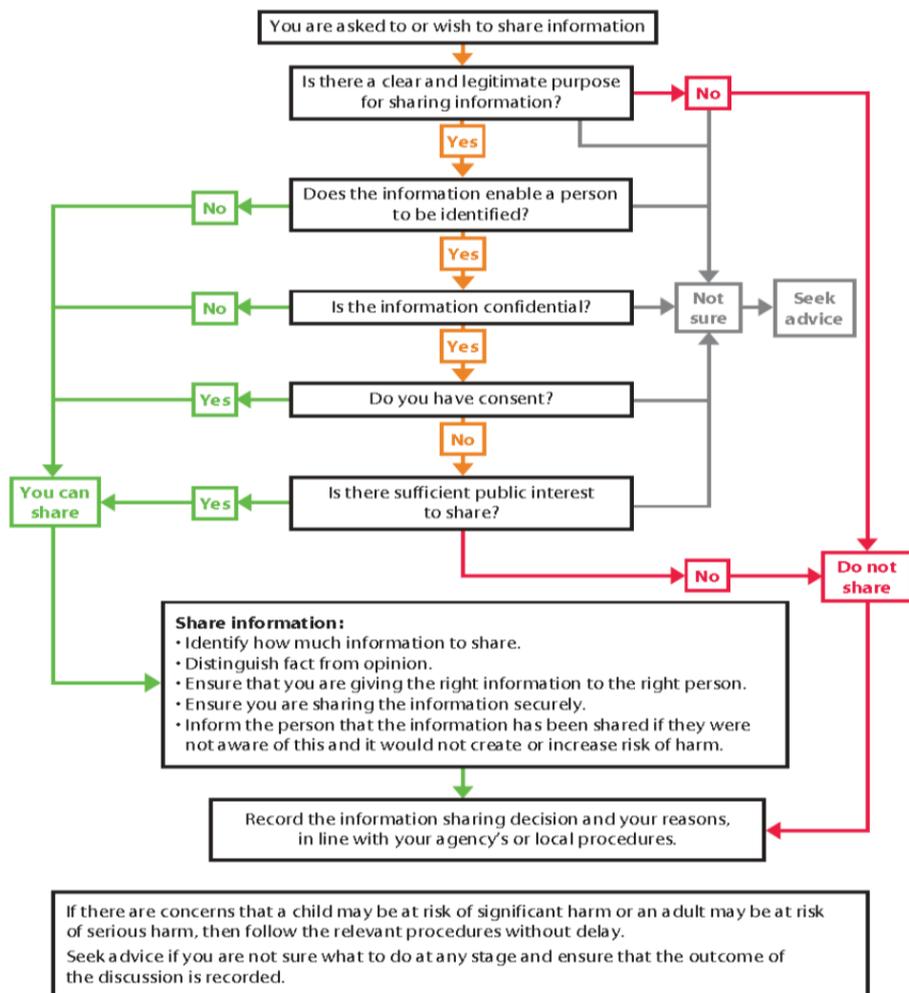
1. Remember that the Data Protection Act is not a barrier to sharing information, but provides a framework to ensure that personal information about living persons is shared appropriately.
2. Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
4. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
6. Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

College Contact: Andy Armstrong
Funding & Compliance Manager

Extract from HM Government *Information Sharing: Guidance for practitioners and managers*.
Copies can be obtained from www.ecm.gov.uk/informationsharing



Flowchart of key questions for information sharing



Local contacts

Extract from HM Government *Information Sharing: Guidance for practitioners and managers*.
Copies can be obtained from www.ecm.gov.uk/informationsharing

Annex E Code of Conduct for Staff in relation to Safeguarding

The Code of Conduct applies to all staff, whether teaching, administrative, management, support or volunteers, temporary or permanent. The word “staff” is used for ease of description.

The aim of this Code of Conduct is to provide all staff at the College with guidance. The intention is to minimise the risk of staff being accused of improper conduct, particularly towards students or apprentices with whom they come into contact during the course of their work.

You should always:

- wear a staff identification badge, which must be visible at all times whilst on College premises
- ensure that visitors/contractors are signed in and made aware of safeguarding procedures
- treat everyone with respect and dignity
- respect students' and apprentices' right to privacy
- avoid any conduct which could lead any reasonable person to question your motivation and intentions
- take seriously any allegations, suspicions or concerns about abuse that a student or apprentice makes (including those made against staff) and report them, following procedures outlined in the Safeguarding Policy and Procedures)
- provide an opportunity and a safe environment for students and apprentices to be able to discuss or raise concerns they may have
- risk assess all situations, activities, buildings and trips to ensure all potential dangers have been identified and the risk minimised
- create an environment that encourages students and apprentices to feel comfortable and confident in challenging bullying and any attitudes or behaviours that may be discriminatory in any way
- seek advice from your Line Manager if in any doubt about sharing student information or receive a request for student or apprentice's information from an external caller either via telephone, email or face-to-face
- avoid meetings with student or apprentices in remote or secluded areas
- show understanding and sensitivity when dealing with emotional issues

You should never:

- allow or accept abusive and discriminatory behaviour
- make inappropriate personal remarks to a student or apprentice including through email, text messages, phone or letter
- share personal contact details with students or apprentices, this includes personal mobile phone numbers, social networking contacts or personal e-mail addresses
- discuss your own sexual relationships with, or in the presence of students or apprentices

- set up a social networking site that allows anyone to access without invite or inviting students or apprentices to join a personal social networking page or group that is not College approved
- engage in a sexual relationship with students or make sexually suggestive comments
- give personal money to students or apprentices or accept money or gifts from a student or apprentice
- show favouritism
- promote your religious or political ideas or beliefs
- provide lifts in your car to students or apprentices without prior written agreement from your Line Manager. If you are providing a lift to students or apprentices, ensure there are two members of staff present in the car and business insurance is in place
- promise to keep any information a student or apprentice discloses confidential
- use your position to gain access to information for your own advantage and/or at a student or apprentices or to their family's detriment
- never indulge in horseplay, tickling or fun fights

It is not possible to provide a complete checklist of what is, or is not appropriate behaviour in all circumstances.

There may be occasions and circumstances in which you may have to make a decision in the best interest and welfare of students or apprentices which could breach this code. In such instances, you must ensure that a member of the Executive Management Team (EMT) is made aware of the action taken as soon as possible and that a record is kept, so that you are seen to be acting appropriately.

If you require clarification or further information, please discuss with your line manager, HR or the Safeguarding and E&D Manager.