



# City College

N O T T I N G H A M



<b>POLICY AND PROCEDURES</b>	<b>Safeguarding Vulnerable Groups/Prevent Strategy</b>
<b>POLICY NUMBER</b>	MA/U25
<b>ACCOUNTABILITY</b>	DESIGNATED SAFEGUARDING SENIOR LEAD (DSL)
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# SAFEGUARING VULNERABLE GROUPS POLICY AND PROCEDURES, INCORPORATING PREVENT STRATEGY



if you see something, say something

**‘Our lives begin to end the day we become silent about things that matter.’** Martin Luther King

## CONTENTS

	Page Number
1.0 Purpose	3
2.0 Legislation and Codes of Practice	3
3.0 Allied Policies	3
4.0 Aims and Objectives	4
5.0 Our Responsibilities as a College and as an Employer	4
5.1 Nominated/Designated Safeguarding Officers	5
6.0 Who are we safeguarding?	6
7.0 Prevent Strategy	10
8.0 Female Genital Mutilation (FGM) Duties for Teachers	13
9.0 Child Sexual Exploitation	14
10.0 Honour Based Violence	15
11.0 Context reference to Higher Education	15
12.0 Ensuring the Policy is compliant	16
13.0 Guidelines for Responding to a Suspicion or Allegation of Abuse	16
13.1 Contacting the Designated Safeguarding Team	17
13.2 Dealing with Disclosures	17
13.3 Allegations against Staff and Volunteers/The LADO	18
13.4 Making Referrals	18
13.5 Partner College contacts	20
13.6 Multi-Agency Safeguarding Hub (MASH)	20
14.0 Guidelines for College Members working with Vulnerable Groups	20
15.0 Definitions of Abuse (Child or Vulnerable Adult)	21
16.0 E-Safety - a part of Safeguarding Aims	24
17.0 Behaviour Management	25
18.0 Managing Allegations	26
19.0 External References	27
20.0 Key Terms and Definitions	28
<u>Appendices</u>	
Appendix A – Report/Incident Form	29
Appendix B – Schematic Guidance	32
Appendix C – Sex Offender Policy Statement	34
Appendix D – Disclaimer Statement for Staff and Learners	35

Attached: “Safeguarding – What you Need to Know” Booklet

## 1.0 Purpose

The purpose of this document is to set out City College Nottingham's core values and commitment to Safeguarding Vulnerable Groups and, how it will meet and monitor those commitments, and its legal obligations as a provider of education services.

Readers are referred to the Information Guide entitled "*Safeguarding – What you Need to Know*", for key Information, Advice and Guidance, support and definitions.

## 2.0 Legislation and Codes of Practice

Legislation and Codes of Practice relevant to this policy include:

- The Equality Act 2010 specific duties regulations 2011
- The Human Rights Act 1998
- The Disability Discrimination Act (DDA) 1995 (and amendment to DDA 2005)
- Safeguarding Vulnerable Groups Act 2006
- Education & Inspection Act (2002) 2006
- The Data Protection Act 1998/2003 amendment
- The Children's Act 1998 amended 2004
- DfE Keeping Children Safe in Education 2016 (Department for Education)
- Mental Capacity Act 2005
- Protection of Freedom Act 2012
- Safeguarding Children – Guidance for Higher Education Institutions (2007)
- Teaching Standards 2012
- Rehabilitation of Offenders Act 1974 (Exemptions Order) 1975
- Counter-Terrorism and Security Act 2015 – Legislation
- Serious Crimes Act 2015 (FGM)

The College will also refer to the local area City/County Safeguarding Children Boards procedures.

## 3.0 Allied Policies

This Policy and Procedure underpins every aspect of the College's work, and all of its processes, systems, policies and procedures. Nevertheless, this document should be read in conjunction with the following Policies and Procedures (but not exclusively):

AC-U4	Data Protection
MA-U1	Access to Assessment (incorporating Reasonable Adjustments and Special Considerations)
MA-U7	Information Security
MA-U8	Equality, Diversity and Inclusion (EDI)
MA-U15	Health & Safety
MA-U22	Admissions and Enrolment
MA-U27	Support for Learners
<b>MA-U31</b>	<b>E-Safety</b>

MA-U41	Whistle Blowing
MA-U42	Ethics and Code of Practice Policy
<b>HR-U1</b>	<b>Safer Recruitment (Staff and Volunteers)</b>
HR-U2	Staff Performance Management
HR-U4	Staff Training and Continuous Professional Development

Also:

- City College Nottingham's Learner/Apprenticeship Handbooks
- Partner Colleges Safeguarding procedures
- Safeguarding/Prevent Risk Assessment
- Web page (Moodle) guidance

#### 4.0 Aims and Objectives

The underpinning principles of this policy are to:

- cultivate a safe and vigilant culture across the College community, where staff and volunteers are fully aware of their role and responsibilities in the protection of children and vulnerable adults, and confident in identifying and reporting safeguarding concerns
- identify risks which impact of the safety and welfare of children and vulnerable adults
- implement robust risk management strategies, which will protect children and vulnerable adults from harm.

This policy does not seek to discourage activities involving children/young person and vulnerable adults. Instead, this policy seeks to support these activities and to offer assurances to both staff/volunteers, students and visitors that through its implementation, the College seeks to protect children, young people and vulnerable adults and to keep them safe from harm when in contact with College students and staff (whether acting in a paid or unpaid capacity).

The College wishes to ensure that it maintains the highest possible standards to meet its social, moral and legal responsibilities to protect and safeguard the welfare of children, young people and vulnerable adults with whom the College's work brings into contact, whilst recognising that it cannot act 'in loco parentis'. Ultimate responsibility will continue to rest with parents/cares and guardians.

While it is impossible to ensure that a child, young person or vulnerable adult would never come to any harm, the adoption of this policy and associated guidelines aims to facilitate the management of the risk associated with the duty to protect such individuals.

#### 5.0 Our Responsibilities as a College and as an Employer

The College's Designated Safeguarding Team is responsible for:

- Implementing and promoting this policy

- Ensuring that the policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children, young persons and vulnerable adults
- Acting as the main contact within the College for the protection of vulnerable groups
- Ensuring that appropriate College members are provided with information, advice and training on the protection of vulnerable groups
- Providing adequate information on this policy as part of the induction processes for any new College members or volunteers aiming to work with the College
- Establishing and maintaining contacts with the local care services departments, police and **Local Authority Designated Officer (LADO)**
- Managing allegations
- Maintaining confidential records of reported/alleged cases and action taken

## 5.1 Nominated/Designated Safeguarding Officers

The College has a Dedicated Team who are responsible for discharging its Safeguarding and Prevent Duties:

<b>Sarah Berry</b>	<b>Designated Safeguarding Senior Lead</b>
<b>Kevin Rowland</b>	<b>Designated Safeguarding Lead and Facilitator</b>
<b>Shakil Ahmed</b>	<b>Deputy Designated Safeguarding Officer</b>
<b>Tazim Fayaz</b>	<b>Designated Prevent Officer</b>
<b>Jason Jones</b>	<b>Learner Support Services</b>

Some departments have their own specific, supplementary procedures where, for example, the College or professional bodies require particular arrangements. These include:

- HE sector (Higher Education/International Students)
- AP (Alternative Provision)

These areas may nominate a Safeguarding Coordinator who will enable a cascading of information and training on the implications of this policy. A copy of any relevant policy in these areas of College activity should be sent to the College Safeguarding team Coordinator.

It is the College's policy that children under the age of 14 are not allowed into the workplace or onto the College premises other than those children who are formally attending:

- Organised events where they are the responsibility of their school or other institution
- Open days
- Taster days
- For work experience
- As students on a College course

College buildings and their associated safety precautions were designed with an adult population in mind. Consequently, these may be inadequate to protect children, young persons (for example, because of their inexperience, size or inquisitiveness). It is important to remember that a greater duty of care is owed to children, young person's, vulnerable adults than to adults and, where appropriate, risk assessments must include the hazards faced specifically by these groups.

The College reserves the right to exclude children, young persons, and vulnerable adults from some or all of its premises. In general the children of College Members should not enter the premises, except for brief periods when they are fully under the supervision of a parent/carer. The College is clear that a member of staff, or any student or visitor, who is working or studying on College premises, cannot at the same time provide full supervision of children, young persons. If an emergency childcare situation arises, a College member may bring a child onto College premises in order to make arrangements with their manger for work to be covered, or to take home.

Where adaptations are reasonable and proportionate, the College will then put in place a number of 'control measures' (in the language of health and safety) in order to safeguard the wellbeing of that child/young person and vulnerable adults. This will be carried out by the Safeguarding Officer at enrolment to a course or within a course, where a need is deemed a concern. *Rehabilitation of Offenders Act 1974*

The organisation does not consider it practicable to take steps other than those described above, to vet the backgrounds of learners who, during the course of learning and teaching or administrative activities, come into contact with other learners who are children/young persons or vulnerable adults.

The use of photography or recorded still or moving images of children, young persons, and vulnerable adults is prohibited without signed consent by the child's parent/guardian/carer.

College members are required to safeguard images of children, young persons and vulnerable adults and only use them for the permitted purposes.

## 6.0 Who are we safeguarding?

This policy sets out the requirements with which College members must comply in respect of child protection, young persons and vulnerable adults and safeguarding within the work of the College.

This policy covers children, young persons, and vulnerable adults as follows:

- 'child' or 'children' refers to a person or persons under that age of 18 years (as defined in the Children Act 2004)
- 'vulnerable adult' is a person aged 18 or over who may be in need of community care services by reason of mental or other disability, age or illness,

and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation. (as defined by the Department of Health – No Secrets Guidance 2000)

In this document, child/children/young person is used generically and includes vulnerable adults. College member is used to describe: staff, students, volunteers and governors/directors of the College, others approved by the College to teach or examine on its programmes and contractors; premises includes all buildings, grounds, roadways, vehicles and other means of transport belonging to the College. All references to the Safeguarding Team, the College Student Union/Rep are expected to adopt this policy and support the development with the Student Council meetings.

Any incidents of alleged misconduct concerning any of the named groups will be taken seriously by the College and responded to swiftly and appropriately in accordance with this policy.

Where appropriate, breaches of this policy and/or allegations of misconduct concerning any of the named groups will result on the College invoking its Disciplinary Policy procedures in respect of staff or the handbook of Student Regulations in respect of students.

The College will refer concerns that a named group might be at risk of significant harm to local social services and/or the police.

All personal data will be processed in accordance with the Data Protection Act 1998/2003 requirements.

All College staff/volunteers members working in a regulated activity will undergo an Enhanced Disclosure Barring Service check with barred list check to determine the suitability for the position, prior to engaging them. Eligible staff in post will also be re-checked at three yearly intervals to confirm their ongoing suitability.

The College will maintain a central record of staff and volunteers' DBS disclosures and training history via a database (the **Single Central Safeguarding Register**), the maintenance of which is the responsibility of the Resources Manager. The Register will be regularly updated to ensure accuracy and currency, and may be shared with funding partners as part of due diligence requirements.

**Regulated Activity** is work that a **barred person must not do**.

Regulated Activity as defined relating to children/young people:

- Any activity which involves contact with a specific nature e.g. Teaching, training, instruction, care for or supervision, (except if the person undertaking the activities is under regular supervision\*) if carried out by the same person frequently\* or overnight\*.

- Advice and guidance (except legal advice) provided wholly or mainly for the specific group which relates to their physical, emotional or educational well-being if carried out by the same person frequently\* or overnight\*.
- Where that activity is wholly or mainly the role, and not merely incidental.
- Driving a vehicle used for conveying persons under the group – meaning the vehicle is used only for conveying named and their cares or supervisors under a contract or similar arrangement when carried out by the same person frequently\*.

Day to day management on a regular basis, of a person who is providing a regulated activity in relation to a child/young person. This includes the supervisor of a person who would be in a regulated activity if not under regular supervision\*.

#### Statutory Supervision Guidance:

To be supervised in accordance with HM Government statutory guidance, the supervision must be regular and day-to-day, by a person engaging in regulated activity and reasonable in all the circumstances for the protection of children/young person.

*Further information is provided in the HM Government statutory supervision guidance available from the DBS website.*

#### Supervising a child/young person in Employment:

Excepted from regulated activity relating to children/young person is a person who supervises a named person in the course of the child/young person's employment including work experience. However, it is regulated activity if the child/young person is under 16 and it is carried out by an unsupervised\* person for whom arrangements exist principally for that purpose.

#### Legislation and Guidance:

Regulated activity relating to children/young people is defined in schedule 4 to the Safeguarding Vulnerable Groups Act 2006 (as amended\*).

**\*Any frequency** means that doing the activity once or more is regulated activity.

**Supervision** as defined in statutory guidance on supervision

**Frequently** means once a week or more intensive means four times in any 30 day period

**Overnight** means once or more between 2am and 6am with the opportunity for face to face contact with the group.

#### Regulated Activity (Adults)

The definition of 'regulated activity' (adults) as defined by the Safeguarding Vulnerable Groups Act 2006 as from 10<sup>th</sup> September 2012.

\* As amended by the Protection of Freedoms Act 2012 (PoFA) <http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

The definition of a regulated activity provided to an adult, if any adult requires them, will mean that the adult will be considered vulnerable at that particular time. This means the SVGA (Safeguarding Vulnerable Groups Act) will no longer label adults as 'vulnerable'

because of the setting in which the activity is received, nor because of the personal characteristics or circumstances of the adult receiving the activities.

This means, for example, anyone providing personal care to an adult is in regulated activity irrespective of whether that occurs in, say a hospital, a care home, a day care centre, a prison or in sheltered housing. There is no longer a requirement for a person to carry out the activities a certain number of times before they are engaging in a regulated activity. Any time a person engages in the activities set out below, they are engaging in the regulated activity.

**Note:** Regulated Activity continues to exclude any activity carried out in the course of family relationships, and personal, non-commercial relationships. (Section 58 SVGA provides for this; 58 was not amended by the PoFA).

- Family relationships involve close family (e.g. parents, siblings, grandparents) and relationships between two people who live in the same household and treat each other as family.
- Personal, non-commercial relationships are arrangements where either no money changes hands, or any money that does change hands is not part of a commercial relationship (for example, gifting a friend money for petrol after they have driven you to an appointment), and the arrangement is made between friends or family friends.

An adult is a person aged 18 years or over.

A person whose role includes the day to day management or supervision of any person, who is engaging in regulated activity, is also in regulated activity.

As part of the changes to a regulated activity there are six categories within the new definition of the regulated activity.

- Providing Health Care
- Providing Personal Care
- Providing Social Work
- Assistance with general household matters
- Assistance in the conduct of a person's own affairs
- Conveying\*

\*Conveying does not include licensed taxi drivers or likened private hire drivers, and does not include trips taken for purposes other than to receive health care, personal care or social work (for example, trips for pleasure are excluded). A person who volunteers to take an adult to and from their GP appointment on behalf of a community group is in regulated activity. It would not matter if that person knows, or is friends with, the adult they were taking to the appointment if the conveying is on behalf of the group.

## 7.0 Prevent Strategy

### Prevent and Counter Terrorism

City College Nottingham takes its responsibilities for safeguarding very seriously. In accordance with the Counter Terrorism and Security Act the College has a responsibility to prevent people from being drawn into terrorism/radicalisation and participates fully in such work.

Prevent is a strand of the Government counter terrorism strategy – CONTEST. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat faced from those who promote these views.
- Provide practical help to stop people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet, social media and health.

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical – an attack is expected imminently
- Severe – an attack is highly likely
- Substantial – an attack is a strong possibility
- Moderate – an attack is possible but not likely
- Low – an attack is unlikely

The current threat level from international terrorism in the UK and in the East Midlands is severe which means that a terrorist attack is highly likely.

City College Nottingham is a community led education provider working within Nottinghamshire, Derbyshire and Leicestershire supporting young and vulnerable people from ethnically diverse and socially and economically disadvantaged areas. The age and profile of students make it crucial to be actively involved in the Prevent strategy. The College has a part to play in fostering shared values and promoting cohesion. Extremist ideology runs counter to the College and British values which make our community successful such as respect and tolerance for others, the rights of all to live and study free from persecution of any kind, freedom of speech, democracy, the rule of law and equality of opportunity and treatment. Extremism promotes fear and division and actively seeks to cause destructive relationships between different communities.

This strategy has five key objectives:

1. To promote and reinforce College and British values; to create space for free and open debate; listen and support the learner voice and enable students to develop their self-knowledge, self-esteem and self-confidence.
2. To promote social cohesion by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society.
3. To ensure student safety and that the College is free from bullying, harassment and discrimination.
4. To provide support for students who may be at risk and appropriate sources of advice and guidance.
5. To ensure that students and staff are aware of their roles and responsibilities in preventing terrorism and radicalisation.

In order to achieve these objectives the strategy will concentrate on four areas:

### **Leadership and Values**

To provide an ethos which upholds core values of shared responsibility and wellbeing for all students, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting College values of commitment, learning, partnership, respect, standards and trust
- Building staff and student understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

### **Learning and Teaching**

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of students, by undermining extremist ideology and enabling students to acquire a broad knowledge of and respect for public institutions. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skills development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights
- Learning and teaching strategies which explore controversial issues in a way which promotes critical analysis and pro social values

- Use of external programmes or groups to support learning while ensuring that the input supports College goals and values
- Encouraging active citizenship and facilitating students to accept responsibility for their behaviour, show initiative and understand how they can contribute positively to society

## **Student Support**

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Maintaining strong and effective support services for all students
- Listening to what is happening in the College and the community and taking action as necessary
- Implementing anti-bullying strategies and challenging any discriminatory behaviour
- Helping students and staff know how to access support in College and or through community partners
- Supporting at risk students through safeguarding and crime prevention processes focusing on narrowing the attainment gap for all students

## **Managing Risks and Responding to Events**

The College must be able to demonstrate an awareness and understanding of the risk of radicalisation, appreciating that this can change rapidly.

The College has used existing mechanisms for understanding the risk of radicalisation; ensuring that the duty is communicated and that staff understand the risk and have the capabilities to deal with any concerns. A specific risk has been added into the register.

To ensure that the College monitors risks and is ready to deal appropriately with issues which arise. It will:

- Understand the nature of the threat from violent extremism and how this may impact directly or indirectly on the College
- Understand and manage potential risks within the College and from external influences
- Respond appropriately to events in local, national or international news that may impact on students and communities
- Ensure measures are in place to minimise the potential for acts of violent extremist within the College
- Ensure plans are in place to respond appropriately to a threat or incident within the College
- Develop effective e-safety and responsible users policies

## Procedure

The College views Prevent within the safeguarding responsibilities as well as fitting with the wider educational role, promoting community cohesion and teaching students to respect others.

As such, should there be a concern; this should be reported in accordance with the Safeguarding Policy.

There is also guidance in the Whistle-blowing Policy about raising concerns about terrorism and/or radicalisation.

## Defining British Values

For the purpose of this strategy British Values will be defined as:

“Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different backgrounds, characteristics, beliefs and faiths”

The government’s own definition of extremism as contained within the Prevent strategy will be the definition used within this policy and is:

*Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces.*

## 8.0 Female Genital Mutilation (FGM) Duties for Teachers

### FGM - New reporting duty on teachers

Serious Crime Act 2015 came into force. Updated from previous versions

Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. The Female Genital Mutilation Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.

The Serious Crime Act 2015 strengthened further the legislation on FGM and now includes:

- The right to anonymity for victims
- The offence of failing to protect a girl aged under 16 from the risk of FGM
- The provision of Female Genital Mutilation Protection Orders (FGMPO); and
- The duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18.

NB For school staff discovering FGM will occur from a disclosure and not a physical examination.

## 9.0 Child Sexual Exploitation (supporting the wider safeguarding agenda)

Child sexual exploitation is defined as:

**Child sexual exploitation (CSE)** is a type of **sexual** abuse. **Children** in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing **sexual** activities or others performing **sexual** activities on them.

- Can be violent, humiliating and degrading
- Consent cannot be given even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them
- Does not always involve physical contact & can happen on line
- A significant number of victims go missing from home, care & education and this is a warning sign. Noticeable signs in the child can include aggression, anxiety, depression, and change in physical appearance and becoming involved in gangs.
- Other possible indicators of sexual exploitation can include: children who have older boyfriends or girlfriends, children who misuse drugs and alcohol and children who appear with unexplained gifts or new possessions

### Staff Concerns

- About staff: to be aware of who staff concerns should go to in your organisation
- A reminder to all staff that it is illegal for a person in a position of trust to have a relationship of a sexual nature with someone in their care under 18
- Professional boundaries
- About poor or unsafe practices: staff should feel able to raise concerns *and feel that these will be taken seriously*
- Appropriate whistle blowing procedures should be in place for such concerns to be raised
- Under 18s must be trained in keeping safe, including keeping safe on line
- Early interventions are key – any doubt about a student's safety, raise concern
- We need to continue to be alert to recognising abuse & neglect of under 18s with special educational needs & disabilities i.e. can be disproportionately impacted by bullying
- Missing children: ensure you understand your internal policy/practice to raise concerns
- All staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include but not limited to: bullying (including cyber bullying) gender based violence/sexual assaults and sexting. Staff should be clear on policy re peer on peer abuse; need to make it clear that peer on peer abuse should never be tolerated or passed off as 'banter'

## 10.0 Honour Based Violence

- Encompasses crimes which have been committed to protect or defend the honour of the family &/or community
- Is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family
- Honour based violence may be committed against someone who: became involved with a boyfriend or a girlfriend from a different culture or religion or wears clothes or takes part in activities considered as non traditional
- Includes female genital mutilation (FGM) & forced marriage – both are crimes in the UK
- All forms of HBV are abuse (regardless of the motivation ) & should be handled & escalated as such
- Other crimes in the name of honour include domestic abuse, sexual and psychological abuse and holding someone against their will
- We need to be alert to victims of this & the support they would need

## 11.0 Context reference to Higher Education

(Extract from Executive Summary: Safeguarding Children: Guidance for Higher Education Institutes (HEIs), Department for Innovation, Universities and Skills 2007)

As part of the Government's Every Child Matters agenda – the aim is to ensure every child attains their full potential. Safeguarding children/young people from harm plays an important part in meeting this goal. Safeguarding is also relevant to meeting any duty of care that Higher Education Institute (HEI) may owe towards children (i.e. those aged under 18) with whom it has contact.

The term 'safeguarding' is outlined as putting in place 'arrangements to take all reasonable measures to ensure that risks of harm to children/young person's welfare are minimised'.

There is no legislation in the area of safeguarding that is directed specifically at HEIs. However, some pieces of legislation and, in some circumstances, the common law, place responsibilities on organisations in general, along with the Data Barring Service guidance, this will have an impact on HEIs. It is for HEIs to make sure that they know about their legal responsibilities and how to comply with them, and to ensure that they are doing so.

Staff need to be aware of the HEIs policies and procedures. Representatives from across the HEI are involved in the implementation and are contributing to a culture in which safeguarding is discussed openly.

## 12.0 Ensuring the Policy is Compliant

Through the Designated Safeguarding Team, the College will ensure that the College members are kept fully briefed and/or trained (as appropriate) on the implications of this policy. College members will be expected to observe the guidelines set out in this policy.

The College will train and supervise College members to adopt best practice to safeguard and protect the groups from abuse and to minimise risk to themselves. This includes providing access to annual update training and signposting to suitable on-line awareness raising courses. For Designated Safeguarding Leads, there will be requirement to attend DSL refresher training every two years. In addition to leading on training intervention, DSL's will also be required to ensure that College members receive safeguarding and child protection information updates through its internal communications systems, including via meetings, e-mail and the Moodle (Staff Room area)

Where appropriate, breaches of this policy and/or allegations of misconduct, results in Disciplinary Procedures in respect of staff or students. College members will be entitled to be accompanied at any meetings held by the College whether under the Disciplinary Procedure or otherwise.

In accordance with *The Public Interest Disclosure Act 1998* College members can raise issues of public concern without threat of reprisal as outlined in the College's Whistle Blowing Policy.

Before a work experience placement takes place involving those under school leaving age, it is the responsibility of the College member supervising the placement to ensure that a risk assessment is carried out and provided to the parent/guardian of the person involved. The child/young person should be supervised at all times (except breaks) and parental consent (including emergency medical permission) must be obtained.

As part of the communication procedures the College will embed the Safeguarding, Prevent, E-Safety procedures as part of the meeting structure:

- Team meetings all sectors
- SMT meetings
- Board meetings
- One-to-one meetings
- Appraisal meetings
- Partner meetings

## 13.0 Guidelines for Responding to a Suspicion or Allegation of Abuse

All College members must be alert to the possibility that the child/young person or vulnerable adult they are working with may have been, or may be, at risk of being abused. All complaints/allegations of such abuse must be taken seriously and dealt with in accordance with the following procedures:

Where a detailed department policy is in place, staff should refer to the reporting procedure in accordance with the policy. However, should there be any doubt regarding a policy or if no department policy exists, the guidance below must be followed; **If a College member has a suspicion that a person is being abused he/she should seek the advice and assistance of the Safeguarding Team, setting out the basis of the suspicion as clearly as possible.** This should be done immediately without awaiting confirmation of concerns.

### *13.1 Contacting the Designated Safeguarding Team*

Sarah Berry	01159 101477 or 0776 2057379	e-mail <a href="mailto:sarah@ccn.ac">sarah@ccn.ac</a>
Kevin Rowland	01159 101463 or 0753 3563895	e-mail <a href="mailto:kevin@ccn.ac">kevin@ccn.ac</a>
Shakil Ahmed	01159 101463 or 0781 6405533	e-mail <a href="mailto:shakil@ccn.ac">shakil@ccn.ac</a>
Tazim Fayaz (Prevent)	01332 332335 or 0743 5960829	e-mail <a href="mailto:tazim@ccn.ac">tazim@ccn.ac</a>

### *13.2 Dealing with Disclosures*

If a College member receives from a child/young person an allegation that, that child/young person or another child/young person is being abused, has been abused, or is at risk of abuse he/she should:

- Listen carefully and stay calm
- Ensure that he/she does not interview the person. However, if necessary, he/she may seek to clarify, using open questions and without putting words into the child/young person's mouth, in order to be sure that they understand what the person is disclosing to them
- Reassure the person that by telling him/her they have done the right thing
- Inform the person that he/she must pass the information on, but only to those that need to know about it will be told – 'you are not breaching the Data Protection Act by doing so'
- Inform the person to whom he/she will report the matter to
- Make a detailed note of the date, time, place, what was disclosed, what was said by who, questions asked of the person etc – these records are vital in the record and reporting procedures
- College members should not investigate concerns or allegations themselves but should report them immediately to the Safeguarding Team (senior Manager in the absence of the team)
- College members should not make referrals to Social Care Services or other Authorities themselves save than in consultation with the Safeguarding Team member
- On receipt of a report of a suspicion/allegation of abuse (which may be contemporary or historical) by a College member, the Safeguarding Officer will make the referral to the local Social Care Services department and/or the police where there is a significant risk of harm to a person and take steps to initiate the appropriate staff or student disciplinary procedure when appropriate

- Where an allegation of abuse is received by the College concerning a College member the delegated Safeguarding Officer will consult with the Social Care Services as required
- In the absence of the Safeguarding Officer and or Deputy, College members should discuss any suspicion or allegation of abuse with the **Local Authority Designated Officer (LADO)** or the police where there appears to be significant risk of harm to a child/young person or vulnerable adult.

### *1.3.3 Allegations against Staff and Volunteers/The LADO*

College members are required to be vigilant not just about signs of abuse amongst children and vulnerable adults, but also to be vigilant about a colleague's behaviour at work, home or online, which may cause concerns about their suitability to work or volunteer with children and young people. This includes a person who works with anyone under the age of 18 who may 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 in a way that indicates that they would pose a risk of harm to children**

If an allegation is made against a staff member or volunteer who works with children which meets one or more of the above criteria, the LADO must be notified within 24 hours of any incident or allegation. Under normal circumstances (on the basis that internal reporting procedures are followed), the Designated Safeguarding Lead will notify the LADO, however, if a College member has been unsuccessful in contacting any of the Designated Safeguarding Team, he/she may need to contact LADO directly, including using the Out of Hours Service, where necessary.

The LADO holds responsibility to deal with allegations of abuse on behalf of the relevant local authority Safeguarding Children's Board:

**Nottingham City LADO ☎ 0115 8764148**

<http://www.nottinghamcity.gov.uk/media/413117/allegations-management.pdf>

**Nottinghamshire LADO ☎ 0115 8041272**

<http://www.nottinghamshire.gov.uk/nscb/contact>

**Derby/Derbyshire LADO: 01332 642376**

<http://www.derbyscb.org.uk/staff-and-volunteers/info-and-resources/allegations/>

### *1.3.4 Making Referrals*

On receiving a report of suspected abuse or of a sustainable allegation, the Designated Safeguarding Lead should immediately refer the case to Social Services:

Nottingham City ☎ 0115 915 0800

<http://www.nottinghamcity.gov.uk/children-and-families/childrens-social-care-services/contact-childrens-social-care-services/>

Nottinghamshire

☎ 0300 456 4546

[http://www.nottshelpyourself.org.uk/kb5/nottinghamshire/directory/service.page?id=atr6z36zBpc&directorychannel=3\\_19](http://www.nottshelpyourself.org.uk/kb5/nottinghamshire/directory/service.page?id=atr6z36zBpc&directorychannel=3_19)  
[www.nottinghamshire.gov.uk/.../emergency-contacts](http://www.nottinghamshire.gov.uk/.../emergency-contacts)

Derby City

☎ 01332 641172

<http://www.derby.gov.uk/health-and-social-care/safeguarding-children/worried-about-a-child/>

Derbyshire

☎ 01629 533190

[https://www.derbyshire.gov.uk/social\\_health/social\\_care\\_contacts/default.asp](https://www.derbyshire.gov.uk/social_health/social_care_contacts/default.asp)

- If the child is an open case with an allocated social worker, to the child's social worker direct; or
- If the child is from a school or FE College, to the Safeguarding Officer of that school or FE College; or
- Where possible parents/carers will be notified if a referral is to be made. If a child/young person appears to be at risk of significant harm parents/carers may be asked to give consent to the referral, but even if consent is not given, the referral should still be made. **If seeking consent might increase the risk to the child/young person, then a referral can be made without doing so.**
- For referrals of vulnerable adults contact City Adult Health, Social Care and Housing Department (tel: 0115 8838460 or 08449 808080) this will depend on where the vulnerable adult lives.

All referrals should be recorded in writing by the Designated Safeguarding Lead within three working days of the referral.

A child/young person or vulnerable adult who is not being abused or at risk of abuse may nevertheless be 'in need' of local authority services and such cases should be made known to the Social Service Department. **If the child/young person or vulnerable adult appears to be at risk of significant harm then a referral must always be made.**

Useful contacts for Child/young person

NSPCC

Tel: 0808 8005000

Text: 88858

e-mail: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

online: [www.nspcc.org.uk/reportconcern](http://www.nspcc.org.uk/reportconcern) on line also has SIGN Video for deaf or hard of hearing

Contacting your local police – Child Protection Unit on 101 in an emergency 999

### 13.5 Partner College Contacts

Vision West Notts College:	Patricia Harman: 01623 627191
New College Nottingham:	Dianne Sparkes: 01159 125502 ext 3473
Central College Nottingham:	Vicki Stockdale: 01159 146414 ext 2368
Burton and South Derbyshire College:	John Beatty: 01283 494471

### 13.6 Multi Agency Safeguarding Hub (MASH)

The MASH will deal with new safeguarding concerns, where someone is concerned about the safety or well-being of a child or adult, or thinks they might be at risk of harm.

Contact: 0300 5008090 Monday to Friday 0830am to 17.00hrs  
Out of office Emergency Number 0300 456 4546

### 14.0 Guidelines for College Members working with Vulnerable Groups

College members are reminded that it is a criminal offence for an adult to engage in sexual activity with a person under the age of 18 and where applicable a vulnerable adult, where the adult is in a position of trust in relation to the person. (Sections 3 and 4 of the Sexual Offences (Amendment) Act 2000 refers)

The College recommends that all College members take steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- Maintaining a register of the group they are working with
- Always working in an open environment with children/young person and vulnerable groups i.e. in a classroom ensure the door has a viewing window clear and accessible
- Avoid unnecessary physical contact with any group unless to prevent danger to the person or others
- First aid treatment should be carried out with more than one adult present unless a delay could prove life-threatening
- Avoiding unaccompanied journeys with a child/young person or vulnerable adult. Always use the official mode of transport for the event and ensure the appropriate parental/carer consent has been received and verified
- Avoid unaccompanied time with any group
- Not making suggestive remarks or being inappropriately familiar with children/young persons and vulnerable adults, as this could be mis-interpreted by them
- Avoiding inappropriate familiarity with any person named in the group profile
- Always acting upon and recording allegations/reports of abuse made by any person in the named group
- Always reporting potential concerns/allegations/reports of abuse or potential abuse made by children/young persons and vulnerable adults to the Safeguarding Team; or in absence of the team to a senior Manager

- Not involving or allowing children/young person or vulnerable adult to socialise with them and/or to visit them at home
- Not giving the child/young person or vulnerable adult contact details such as address, home or personal mobile numbers and personal e-mail addresses – contact details should always be restricted to workplace details
- Reporting any potential concerns to their head of department

In appropriate cases and in accordance with the law, the College reserves the right to report to the appropriate authorities any concerns it has that a College member (or former College member) ought to be included in any list of people who should be restricted from working with Vulnerable Groups.

*Refer to Section 9.0 for further clarification*

## 15.0 Definitions of Abuse (Child or Vulnerable Adult)

**“Abuse** [is] 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 institution or community setting by those known to them or, more rarely, by others (eg via the internet). They may be abused by an adult or adults, or another child or children” (DfE Keeping Children Safe in Education 2016)

There are four different types of abuse, which are outlined below:

### **Physical Abuse**

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

### **Neglect**

Neglect is the persistent failure to meet a child/young person or vulnerable adult’s basic physical and/or psychological needs, likely to result in the serious impairment of the child/young person or vulnerable adult’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food and clothing, shelter (including exclusion from home or abandonment)
- Protect a child/young person or vulnerable adult 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/young person or vulnerable adult’s emotional needs.

## **Sexual Abuse**

Sexual abuse involves forcing or enticing a child/young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child/young person or vulnerable adult 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 in and out of clothing. They may also include non-contact images, watching sexual activities, encouraging to behave in sexually inappropriate ways, or grooming in preparation for abuse (new methods using technology i.e. mobile/tablets Smartphone's Sexting or sending inappropriate images/videos, or through use of camera image in computers to encourage or practice inappropriate behaviour) (see also E-Safety Policy and Procedures).

Sexual abuse is not solely perpetrated by adult males; woman can also commit acts of sexual abuse, as can other children/young person and vulnerable adults.

## **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child/young person or vulnerable adult such as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to a vulnerable person or child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the vulnerable adult or child/young person.

These may include interactions that are beyond the person's development capability; as well as overprotection and limitation of exploration and learning, or preventing the person participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including Cyber bullying) causing vulnerable people frequently to feel frightened or in danger, or the exploitation or corruption of a vulnerable adult/child/young person. Some level of emotional abuse is involved in all types of maltreatment of a vulnerable person or child, though it may occur alone.

"Working together to Safeguard Children March 2010" Ch 1.33-2.36

## **Possible Signs of Abuse**

### **Physical Abuse:**

- Injuries not consistent with the explanation given
- Injuries that have not been treated
- Reluctance to take part in activities (sport/swimming)
- Cuts and scratches
- Repeated urinary infections or unexplained stomach pains

### **Emotional Abuse:**

- Changes in mood
- Clinging behaviour
- Depression, aggression, extreme anxiety

- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers or adults
- Attention-seeking behaviour
- Running away
- Stealing
- Lying

#### Neglect Abuse:

- Under nourishment
- Failure to grow
- Constant hunger
- Stealing or gorging food
- Untreated illnesses
- Inadequate care

#### Sexual Abuse:

- Any allegation of sexual abuse made by a child/young person or vulnerable adult
- Excessive preoccupations with sexual matters
- Sexual activity in words, play or pictures
- Sexually provocative or seductive behaviour
- Severe sleep disturbances
- Eating disorders
- Soiling of clothing or bedding

#### Other forms of Abuse:

- Stranger abuse
- Bullying (abuse by other peers or in employment)
- Gang culture
- Alcohol & Drugs
- Deliberate self-harming (overdose, cutting)
- Domestic violence
- Trafficking of child/young or vulnerable adults
- Prostitution
- Racial and Cultural
- Religions and values
- Forced Marriage (Cultures different from English law)
- Female Genital Mutilation (Cultures different from English law)
- Cyber threats – Social Media platforms Facebook, Twitter

“There are no difficult people.....Only difficult behaviour” Pip Wilson BHP [www.pipwilson.com](http://www.pipwilson.com)

## 16.0 E-Safety - a part of Safeguarding Aims

City College Nottingham aims:

- To increase awareness and encourage students to report concerns regarding Cyber Bullying
- To provide protection, support and reassurance for victims
- To develop the self-confidence and self-esteem of all students
- To develop an effective range of practical 'self-defence' measures for the students to adopt
- To promote an anti-bullying ethos amongst the whole College community
- To ensure the (AUP) Acceptable Use Policy is in place and monitored

The College ethos is clear that bullying in any form is unacceptable. It will not be tolerated and where appropriate referrals to the local police will be applied.

### Responding to Cyber Bullying

Most cases of cyber bullying will be dealt with through the College's existing policies and procedures.

Some features of cyber bullying differ from other forms of bullying and may prompt a particular response. The key differences are:

- Impact: the scale and scope of cyber bullying can be greater than other forms of bullying
- Targets and Perpetrators: the people involved may have a different profile to traditional bullies and their targets
- Location: the 24/7 and anywhere nature of cyber bullying
- Anonymity: the person being bullied will not always know who is bullying them
- Motivation: some students may not be aware that they are doing is bullying
- Evidence: unlike other forms of bullying, the target of the bullying will have evidence of its occurrence
- It is possible that staff members may be a victim and these responses will apply to them too

City College Nottingham along with the external partners currently working with, promote E-Safety awareness to all Staff/Volunteers and Students as part of the overall safeguarding principles.

All staff/volunteers and students are equally responsible for ensuring that E-Safety is developed and understood and that they have a responsibility to each other and the wider community.

## Risks on the Internet..... The 4C s

- Hacking
- Flaming
- Viruses
- Pirating
- Illegal trading
- Fraud
- Scams/Phishing
- Money Laundering
- Medical Drugs
- Defamatory Libel
- Happy Slapping
- Cyber stalking
- Cyber bullying
- Cyber grooming
- Cyber terrorism

**Content** - sexual, racist, spam, violent unreliable/bigoted....

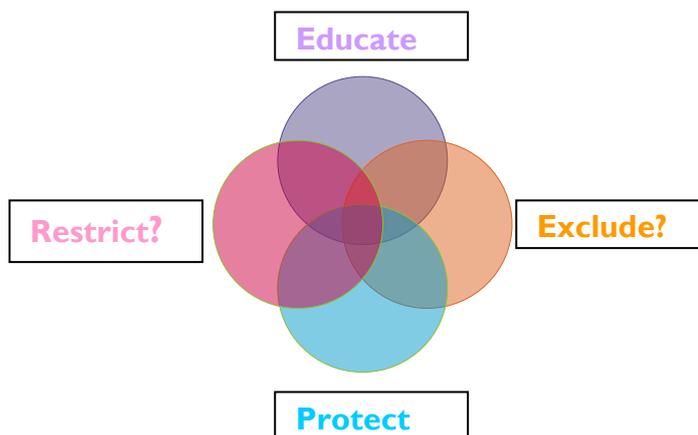
**Commerce** - scams, phishing and downloads which steal information.....

**Contact** – chat rooms, tracking, social networking, multiplayer games....

**Culture** – cyber bullying, camera phones, blogging...

## Influencing Factors

- Learner?
- Age?
- Experience?
- Pedagogy?
- Level of supervision?
- Study environment?
- Topic of study?
- Technology mix?
- Etc..



Students, staff and parents will be involved in evaluating and improving policies and procedures for E-Safety Compliance.



Get Safe Online  
Free expert advice



Associations linked with the College for E-Safety advice and Protection.

## 17.0 Behaviour Management

All persons have the right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour.

No person should use any form of degrading treatment to punish a child/young person or vulnerable adult. It is not acceptable in any circumstance to use sarcasm, demeaning or insensitive comments towards any person or use any form of corporal punishment.

## **Physical intervention**

There are circumstances in which persons working with children/young persons and vulnerable adults displaying extreme behaviour's can legitimately intervene by using physical intervention techniques. This is a complex area in which education and recreational settings must regard to legislation, as well as Government and local authority guidance.

The use of physical intervention must be avoided wherever possible, it should only be used if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably regarded as exceptional circumstances.

The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled and the nature of any harm they may cause. The minimum force necessary should be used and the techniques deployed **must** be in line with recommended policy and practice.

Staff must be aware that the use of unwarranted physical force is likely to constitute a criminal offence.

In all cases where physical intervention is employed the incident and subsequent actions should be documented and reported. This should include written and signed accounts of all those involved, including the child or young person. The parents/carers should be informed on the same day the incident took place.

## **18.0 Managing Allegations**

On receipt of a concern/allegation about an individual, the Designated Safeguarding Lead should liaise with the HR Department over potential suspension from duty, and instigate an investigation.

Whilst enquiries are being made every effort is made to maintain confidentiality and to guard against publicity. If there is any indication of actual or potential media attention the Designated Safeguarding Lead will liaise with the agency's communication and publicity personnel.

In the outcome of the strategy discussion is that the threshold of significant harm has been reached then a strategy meeting will be convened by the Social Care Team. Equally where the complexity of the case warrants a strategy one will be convened. Strategy meetings are chaired by an Independent Reviewing Officer.

Suspension of the individual will be considered, especially where there is cause to suspect that a child/young person or vulnerable adult is at risk of significant harm, the allegation has been escalated to LADO, the allegation warrants investigation by the Police, or is so serious that it might be grounds of dismissal. Serious consideration must be given to the circumstances of the case before a decision to suspend an individual is taken.

### **I have been suspended from my duties whilst enquiries are undertaken, what does this mean?**

Suspension is a neutral act taken by the employer, to provide a safe environment for the individual against whom the allegation has been made, children, school or educational setting, whilst multi agency enquiries are undertaken.

Individuals will be kept advised at each stage of the enquiries, and every effort will be made to ensure that the process is open and transparent.

Once the enquiries have concluded individuals will be clearly informed of the outcome of any investigation and the implications for disciplinary or related processes.

In the event that the individual is the subject of a criminal investigation, which could lead to prosecution, the decision to inform the individual of this will be taken jointly by the Police and other relevant agencies at a Strategy Meeting.

Where the allegations have **been substantiated** then the Named Senior Manager will consider whether a referral should be made in respect of the employee to the appropriate professions governing body (General Teaching Council, etc) and/or to the Disclosure and Barring Service (DBS), who will consider whether the individual should be 'barred' from working with children, young people and vulnerable adults.

Irrespective of whether allegations have or have not been substantiated a clear and comprehensive summary of the allegation, the enquiries undertaken, and a clear account of decisions taken and reasons for them will be held securely upon the employee's confidential personnel file. The record will be held at least until the person has reached normal retirement age or for a period of ten years after the allegation was made, if this is longer. The responsibility for making sure that this happens is the Named Senior Person for the employing agency.

*Working together to Safeguard Children HM Government 2006*

## **19.0 External References**

In compiling this document, the following external references were used:

- Children Act 2004 – with particular reference to section 11
- Working Together to Safeguard Children 2010

- IRSC Guidance for safe working practice for the protection of children and staff in Education settings February 2005
- “What to” flowchart – Appendix B
- Safeguarding Children: guidance for English Higher Education institutions (HEIs) – Dept for Innovation, Universities & Skills 2007
- Protection of Freedom Bill: reference Chapter 2 Criminal Records and Chapter 3 the Disclosure and Barring Service.

## 20.0 Key Terms and Definitions

Term	Meaning
Abuse and Neglect	Forms of maltreatment of a child/young person or vulnerable adult
Child / Young Person	Anyone who has not yet reached their 18 <sup>th</sup> Birthday
Child / Youth protection	Process of protecting individuals identified as either suffering, or at risk of suffering, or at risk of suffering, significant harm as a result or neglect
Children / Youth Social Care or Local Authority	The work of local authorities exercising their Social Services functions with regard to Child / Youth. This is not meant to imply a separate department
Inter Agency	A term indicating those different agencies coming together to provide services for Child / Youth or Vulnerable Adults and their families
Local Authorities	Local Authorities that are Children’s Services Authorities – effectively, local authorities that are responsible for social services and education. <b>Section 63 of the Children Act 2004</b>
LADO	Local Authority Designated Officer
Multi Agency	A more general term to describe the involvement of different agencies
Parent / Carer	This generic term may include birth parents, step-parents, foster-parents, adoptive-parents and carers. The term will specify parental responsibility where necessary
Parental Responsibility (PR)	A legal term from Section 3(1) of the Children Act 1989, ‘meaning’ all the rights, duties, powers and authority which by law a parent of a child has in relation to the child / youth
Safeguarding and promoting the welfare of children	The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care which is undertaken so as to enable children to have optimum life chances and enter adulthood successfully
Wellbeing	Section 10 of the Children Act 2004 requires local authorities and other specified agencies to co-operate with a view to improving the well being of children in relation to the 5 outcomes first set out in “Every Child Matters”.

## **APPENDIX A – Report/Incident Form**

Report of Incident/Concern involving Child/young person or vulnerable adult

This form is to be used in every instance where an employee of City College Nottingham raises a concern about the well being of a Child/young person or vulnerable adult.

It may be completed in consultation with the employee’s line manager and/or College’s designated Safeguarding Officer.

Once completed, it must be submitted to the designated Safeguarding Officer.

Name	
Department	
Position	
Contact details	

Child / Young person /Vulnerable Adult details:

First name	
Surname	
Any other name(s)	
Age & Date of Birth	
Address	
Contact numbers	
Mobile	
Land line	

Parent(s) Carer(s) details:

Name	Relationship	D . O . B .	Contact details

Reason for concern:

Please detail all information, including date, time, place, how long you have known the person and in what capacity, and the precise details of the concern. Clearly define what Fact, Opinion or Hearsay is. (continue on Separate sheet if required)

--

List of evidence, documents, records made etc:

Item	Site
Describe the injury (s) seen by you.	Describe location. (do not ask the person to remove any clothing)

Medical assistance:

Detail any medical assistance you obtained, including the name of any doctor, nurse, or other professional. If an ambulance was called, state the ambulance number and crew details.

--

Police:

If police called, detail who called them, and provide name, badge number, and police station of all officers attending.

Social Services:

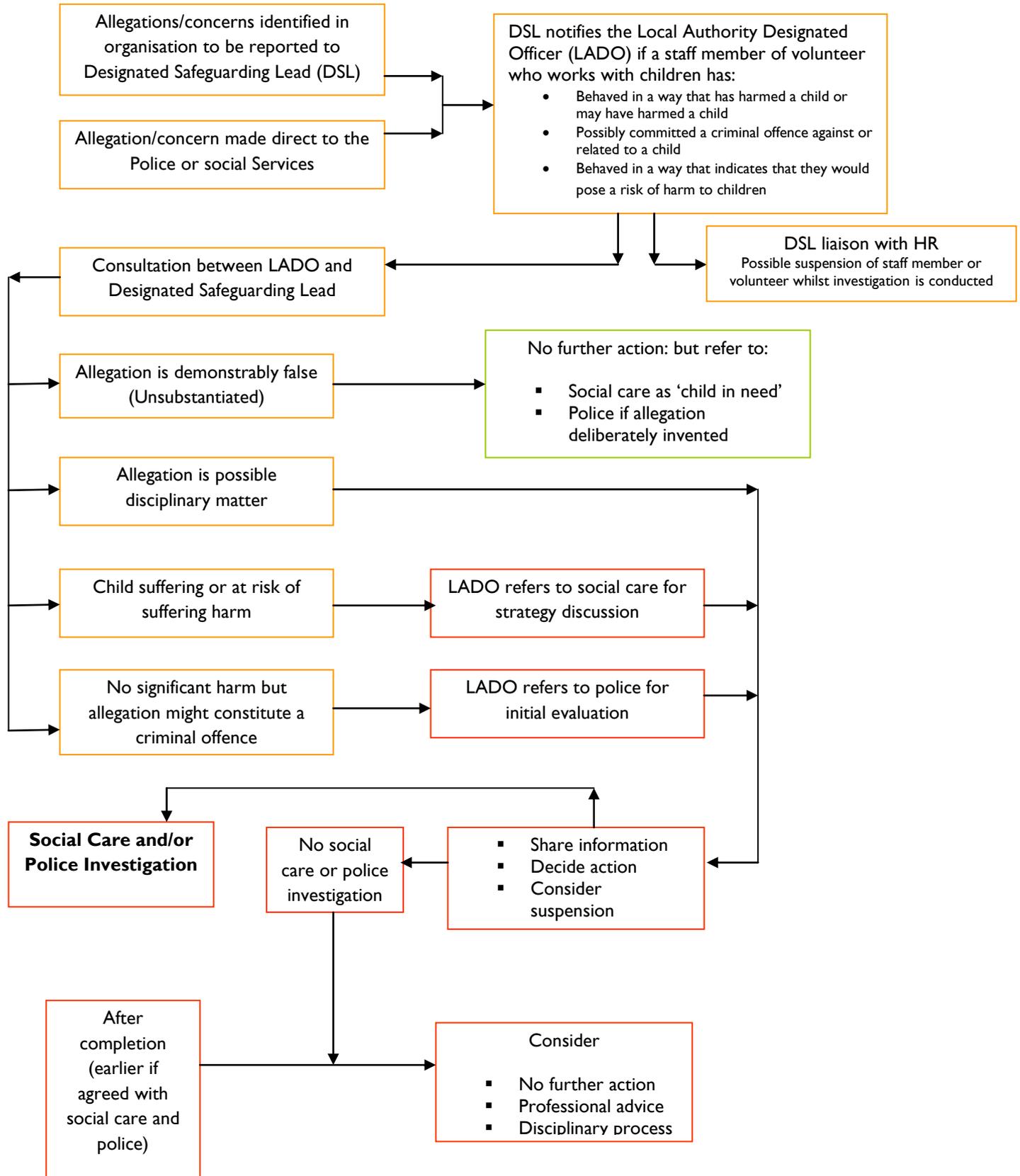
Is Social Services contacted, provide details of who spoken to, time and advice given/received.

Any additional details provided, must be firmly attached to the referral form and clearly showing the same name of the person being referred, and who has referred the concern.

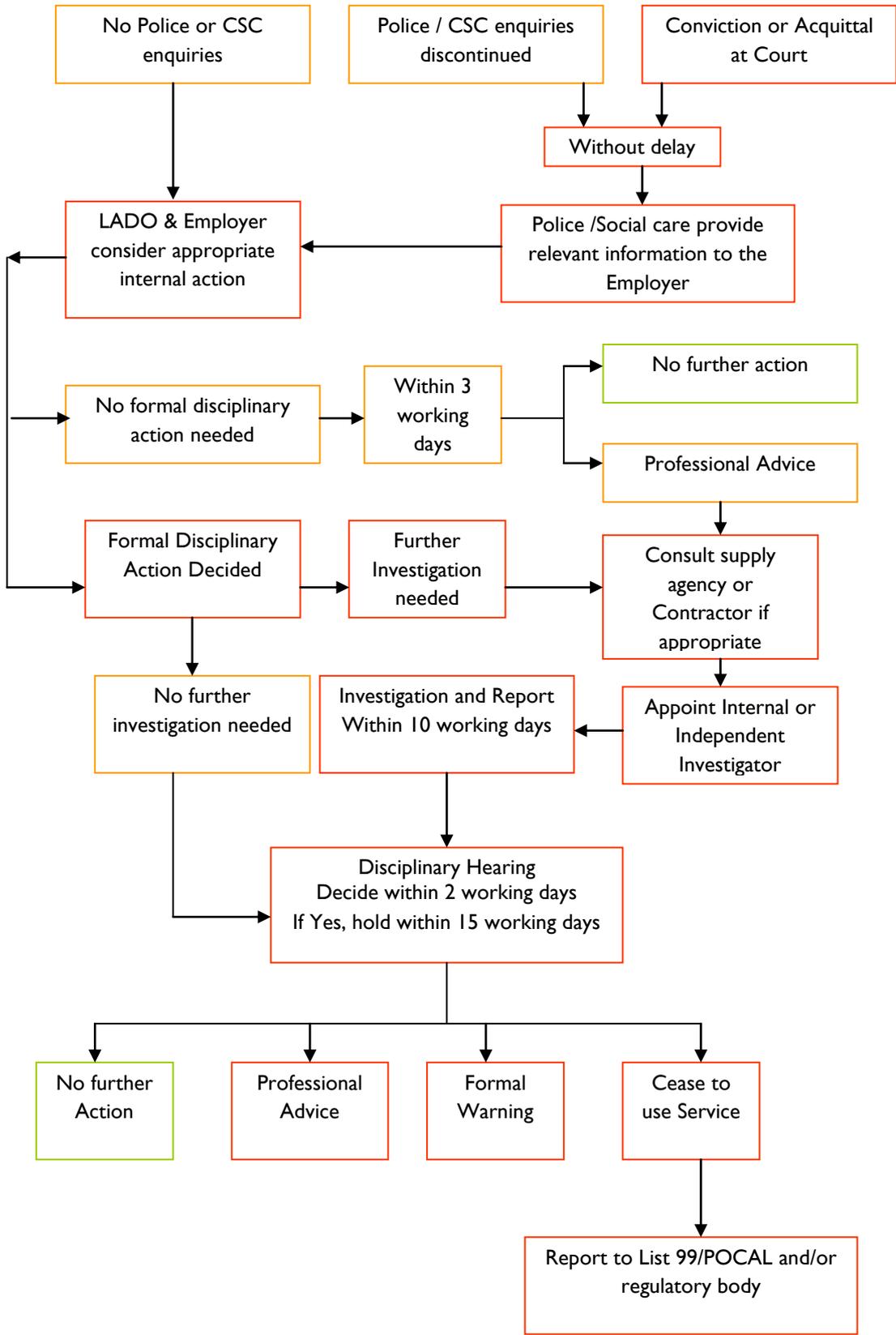
Safeguarding Officer will allocate reference number to the form and secure the details prior to any investigation.

## APPENDIX B – Schematic Guidance

### ALLEGATIONS/CONCERNS AGAINST STAFF AND VOLUNTEERS CHILD/VULNERABLE ADULTS/YOUNG PERSON PROTECTION PROCESS



**ALLEGATIONS/CONCERNS AGAINST STAFF AND VOLUNTEERS  
DISCIPLINARY/SUITABILITY PROCESS**



## **APPENDIXC:**

### **SEX OFFENDER POLICY STATEMENT**

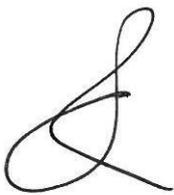
It is the policy at City College Nottingham that we do not work with learners who have a history of sexual offences, nor do we employ a member of staff with such a history. Either employed or volunteering positions.

We recognise that learners with a history of sex offending require specialist support and guidance, and that any organisation working with these learners would require staff with the expertise to give that support and guidance effectively.

City College Nottingham is an organisation specialising in working with young and vulnerable people. We recognise that the care of these people are our first priority, and that the focus of our delivery must ensure their safety at all times.

We recognise that the recruitment of learners / staff with a history of sex offending onto our programmes would increase the risk to our clients.

Signed:



Kevin Rowland

Designated Safeguarding Person

**Appendix D – Disclaimer Statement for Staff and Learners**

*City College Nottingham Staff/Learner Disclaimer Statement*

I have read and understood the City College Nottingham  
Safeguarding Vulnerable Groups Prevent Policy and Procedures

Staff/Learner Name: .....

Occupational Area: .....

Dated: .....

Date added to HR/P file: ..... (staff only)