

1. PURPOSE

- 1.1 Walsall College is passionate about safeguarding our students. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of adults at risk of harm in our care, but also a moral duty. This policy and procedure describes how we recruit and train our staff, support our students, make referrals and deal effectively with allegations against staff. It incorporates a wide range of risks we need to safeguard against and to be clear in our response to the changing landscape of the safeguarding agenda.
- 1.2 Throughout this policy and procedure, reference is made to 'adults at risk of harm'. Adults at risk of harm are defined as people aged 18 years old and over who may need or receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation. The procedure will be applied, with appropriate adaptations to all students.
- 1.3 This policy has been developed with support from Walsall Local Authority, Safeguarding Board Manager, the Walsall Safeguarding Adult Board (WSAB), the West Midlands Regional Procedures and with reference to The Care Act 2014 and is shared with parents/carers on the College website www.walsallcollege.ac.uk
- 1.4 The individual's wellbeing is at the heart of the care and support system under the Care Act 2014 and the prevention of abuse and neglect is one of the elements identified to promote a person's wellbeing. In the context of the legislation, specific adult safeguarding duties apply to any adult who:
- has care and support needs and;
 - is experiencing, or is at risk of, abuse or neglect and;
 - is unable to protect themselves because of their care and support needs.
- 1.5 The following 6 principles apply to all sectors, including further education and should inform the ways in which professionals and other staff work with adults:
- **Empowerment**
People being supported and encouraged to make their own decisions and informed consent
 - **Prevention**
Acting before harm occurs
 - **Proportionality**
The least intrusive response appropriate to the risk presented
 - **Protection**
Support and representation for those in greatest need
 - **Partnership**
Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
 - **Accountability**
Accountability and transparency in delivering safeguarding

2. GOVERNING BODY RESPONSIBILITIES

- 2.1 The Governing Body at Walsall College abide by their responsibilities as outlined in [The Care Act 2014](#) (sections 42 - 46). Governors also have specific responsibility for ensuring

that the College monitors the impact of its work and learns lessons from Serious Case Reviews.

2.2 The Governing Body instructs the College to:

- Provide a safe environment for adults at risk of harm to learn in;
- Identify those who are suffering, or are likely to suffer significant harm or who are at risk of radicalisation;
- Take appropriate action to see that students and children in the Nursery are kept safe at the College, and also that disclosures of potential abuse occurring at home or elsewhere are reported appropriately;
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures;
- Refer concerns that an adult at risk of significant harm or who might be at risk of significant harm to the appropriate referral agents;
- Consider the interagency safeguarding procedure of Walsall Safeguarding Adults Board;
- Listen to the voice of the adult at risk of harm and always act in their interest;
- Ensure appropriate safeguarding responses for adults at risk of harm who go missing from College;
- Ensure there is an effective Safeguarding Policy in place together with a Staff Code of Conduct which include staff/student relationships and communications including use of social media;
- Ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems;
- Utilise the experiences and expertise of its staff when shaping safeguarding policies.

2.3 The Governing Body will approve and annually review policies and procedures and receive regular information relating to safeguarding with the aim of:

- Maintaining awareness of progress across the College and/or issues relating to the welfare of adults at risk of harm;
- Being reassured by the Principal and lead manager that systems are in place and effective in relation to the identification of adults at risk of harm and procedures for reporting concerns are widely known;
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with students through College activity are in place including referral to Designated Officer at the Local Authority (LADO) or the Adult Safeguarding Lead, Walsall Council;
- Ensuring safe recruitment of staff and volunteers;
- Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding;
- Ensuring procedures are in place to make referral to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been if they had not resigned.

In developing policies and procedures, the Governing Body will take account of guidance issued by the Department for Education, [The Ofsted Education Inspection Framework \(EIF\) September 2019](#) and other relevant bodies and groups including [Walsall Safeguarding Adult Board](#) (WSAB). The impact of safeguarding arrangements is tested under the quality

of leadership and management and report on whether or not safeguarding arrangements are effective.

- 2.4 The aim of the [Government's Prevent Strategy](#) is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. This is part of an overall counter-terrorism strategy called CONTEST which is split into four work-streams that are known as the four "P's"- Prevent, Pursue, Protect and Prepare. In the [Counter-Terrorism and Security Act 2015](#) this has simply been expressed as "prevent people from being drawn into terrorism."

The Government's Prevent Strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

The Government has defined extremism in the Prevent strategy as "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". The aim of this safeguarding policy is to ensure, as far as possible, that the College is fulfilling its duty in sections 26 and 29 of the Counter-Terrorism and Security Act 2015. The College will participate fully in work to prevent people from being drawn into terrorism and will ensure that, should this occur, there are procedures to deal with them.

- 2.5 The Principal, Governors and all staff working with adults at risk of harm will receive adequate training to familiarise them with their safeguarding roles and responsibilities. They will be familiar with College procedures and policies and receive refresher training at least every 2 years. A senior member of the College Management Team will be the designated person with lead responsibility for child and adult protection. They will be the Designated Safeguarding Lead (DSL) who will undergo training, at least, every 2 years and in addition, keep up-to-date with safeguarding developments. This person will also be the Single Point of Contact for Preventing Radicalisation (SPOC). They will be assisted by the Deputy Safeguarding Lead and the Safeguarding Team who support and share responsibility for safeguarding students.
- 2.6 The Governing Body will receive from the designated senior member of staff with lead responsibility for safeguarding, an annual report which reviews how the duties have been discharged. In addition, the Principal will include information relating to safeguarding in his termly report to Corporation.
- 2.7 The College recognises the different types and patterns of abuse and neglect and the different circumstances in which they may take place. This is not intended to be an exhaustive list but an illustrative guide within the Care Act 2014, as to the sort of behaviour which could give rise to a safeguarding concern for an adult at risk of harm.

3 TYPES OF ABUSE AND NEGLECT

3.1 Physical abuse including:

- assault
- hitting
- slapping
- pushing
- misuse of medication
- restraint
- inappropriate physical sanctions

3.2 Domestic abuse including:

- psychological
- physical
- sexual
- financial
- emotional abuse
- so called 'honour' based abuse

3.3 Sexual abuse including:

- rape
- indecent exposure
- sexual harassment
- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography
- subjection to pornography or witnessing sexual acts
- indecent exposure
- sexual assault
- sexual acts to which the adult has not consented or was pressured into consenting

3.4 Psychological abuse including:

- emotional abuse
- threats of harm or abandonment
- deprivation of contact
- humiliation
- blaming
- controlling
- intimidation
- coercion
- harassment
- verbal abuse
- cyber bullying
- isolation
- unreasonable and unjustified withdrawal of services or supportive networks

3.5 Financial or material abuse including:

- theft
- fraud
- internet scamming
- coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- the misuse or misappropriation of property, possessions or benefits

3.6 Modern slavery encompasses:

- slavery
- human trafficking
- forced labour and domestic servitude.
- traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

3.7 Discriminatory abuse including forms of:

- harassment
- slurs or similar treatment:
 - because of race
 - gender and gender identity
 - age
 - disability
 - sexual orientation
 - religion

3.8 Organisational abuse

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

3.9 Neglect and acts of omission including:

- ignoring medical, emotional or physical care needs;
- failure to provide access to appropriate health, care and support or educational services;
- the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Neglect is an often under reported or unchallenged concern for adults at risk of harm.

3.10 Self-neglect

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not prompt a section 42 enquiry. An assessment should be made on a case-by-case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

Other types of abuse can include:

3.11 Abuse

A form of maltreatment. Somebody may abuse or neglect an adult at risk of harm by inflicting harm or by failing to act to prevent harm. It may be in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or a child or children.

Safeguarding incidents and/or behaviours can be associated with factors outside College and/or can occur between children outside College. All our staff need to consider the context within which such incidents and/or behaviours occur. This is known as “contextual safeguarding”, which means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare.

3.12 Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to the Safeguarding Team who will liaise with the Multi Agency Safeguarding Hub (MASH), Adult Safeguarding Unit and/or the [Counter Terrorist Unit](#) (CTU) for advice. If appropriate, a referral will then be made to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal. The Counter Terrorism Unit (CTU) will be advised of any emerging themes or immediate concerns/disclosures.

3.13 Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive or threatening behavior, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behavior is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behavior. Coercive behavior is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.”

Refuge runs the [National Domestic Abuse Helpline](#) which can be called free of charge and in confidence 24 hours a day on 0808 2000 247. The website provide guidance and support for potential victims. Additional advice on identifying children who are affected by Domestic Abuse and how they can be helped is available at:

[NSPCC – UK domestic-abuse Signs and Symptoms](#)

3.14 Bullying

The College has a separate policy and procedure for bullying and harassment. Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated, as the College operates a zero-tolerance approach. Bullying of this nature is also against the law. Bullying can take many forms and includes:

- **Emotional:** Being excluded, tormented (e.g. hiding things, threatening gestures).
- **Physical:** Pushing, kicking, punching or any use of aggression and intimidation.

- **Racial:** Racial taunts, use of racial symbols, graffiti, gestures.
- **Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- **Verbal:** Name calling, spreading rumours, teasing.
- **Cyber:** All areas on internet, such as email and internet, chat room misuse. Mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting (Youth Produced Sexual Imagery - YPSI) – please see [“Sexting in Schools and Colleges – Responding to Incidents and Safeguarding Young People”](#) for further information.

3.15 **Students with Special Educational Needs (SEND)**

Students with special educational needs and disabilities can face additional safeguarding challenges. Hate crime against disabled people is said to be on the rise, including so-called "mate crime", where people pretend to befriend a vulnerable person, while secretly stealing from or abusing them. Students within this cohort can be disproportionately impacted by things like bullying without showing any signs. All staff should be vigilant to ensure that they are mindful of signs of abuse which could include changes in behaviour, mood and/or injury and should be aware that there may be communication barriers which may make it more difficult for these students to share concerns and issues. It is important for staff to be aware that assumptions can be made about possible abuse, mood and injury and that this could relate to the child's disability without further exploration.

- ### 3.16 **Child on Child Sexual Violence and Sexual Harassment:**
- Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. We should not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, or “just having a laugh”. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Further information and guidance can be found in the DfE Guidance [Sexual Violence and Sexual Harassment between Children in Schools and Colleges](#).

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003, which are, rape, assault by penetration and sexual assault.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and in the context of child on child sexual harassment. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

3.17 **So-Called Honour Based Abuse**

So called “honour based abuse encompasses 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 are abuse and staff should refer any concerns to the Safeguarding Team. There are a range of potential indicators that a child or adult at risk of harm may be at risk.

Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi Agency Statutory guidance on FGM](#) (pages 59-61 focus on the role of schools and colleges).

3.18 **Forced Marriage**

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). Pages 13-14 of the [Multi-agency guidelines: Handling cases of forced marriage](#) gives potential indicators of someone facing a forced marriage with pages 32-36 focussing on the role of schools and colleges. The Forced Marriage Unit has also published [statutory guidance](#).

College staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

3.19 **County lines:** Criminal exploitation of children and/or adults at risk of harm is a geographically widespread form of harm that is a typical feature of county lines criminal activity: it is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more areas within the UK, using dedicated mobile phones lines or other form of “deal line”. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered.

3.20 **Online Safety:** The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content – being exposed to illegal, inappropriate or harmful material, such as, pornography, fake news, racist or radical and extremist views
- Contact - being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as, making, sending and receiving explicit images, or online bullying
- The college will do all that they reasonably can to limit exposure to the risks detailed above from the college’s IT system. The college has appropriate filters and monitoring systems in place and there is a whole approach to online safety. This includes clear guidance on the use of mobile technology and particularly whilst more students are accessing their learning via a virtual platform on a more regular basis.
- Useful guidance and websites include [Thinkunow](#) the National Crime Agency/CEOPs education programme, [UK Safer Internet Centre](#) and [On-line safety in schools and colleges UKCIS](#).

3.21 **Mental Health:** all staff will 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. Staff 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. We will work with young people

in the college to encourage them to talk about mental health in a positive way and we will train staff to ensure they understand and are aware of mental health concerns, diagnosis and conditions. We also have counsellors in the safeguarding team who are able to work quickly with young people presenting a mental health condition. Staff receive mandatory Mental Health training at the start of the academic year and other courses are delivered through [Mental First Aid England](#). The department has published advice and guidance on [Mental Health and Behaviour in Schools](#) which is useful for our college environment.

- 3.22 **The use of Reasonable Force:** There are circumstances when it is appropriate for our staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions we will consider the risks carefully and recognise the additional vulnerability of these children.

4. DESIGNATED STAFF WITH RESPONSIBILITY FOR PROTECTION FROM ABUSE

4.1 Allegations against People in Positions of Trust

Section 6 (7) of the Care Act states that those providing universal care and support services, should have clear policies in line with those from Walsall Safeguarding Adults Board for dealing with allegations against people who work, in either a paid or unpaid capacity, with adults with care and support needs. The Safeguarding Adults Board needs to establish and agree a framework and process for how allegations against people working with adults with care and support needs (for example, those in positions of trust) should be notified and responded to. Whilst the focus of safeguarding adults work is to safeguard one or more identified adults with care and support needs, there are occasions when incidents are reported that do not involve an adult at risk, but indicate, nevertheless, that a risk may be posed to adults at risk by a person in a position of trust.

Examples of such concerns could include allegations that relate to a person who works with adults with care and support needs who has:

- behaved in a way that has harmed, or may have harmed an adult or child;
- possibly committed a criminal offence against, or related to, an adult or child;
- behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs.

When a person's conduct towards an adult may impact on their suitability to work with or continue to work with children, this must be referred to the Local Authority's Designated Officer (LADO).

Designated staff will have on-going communications with the LADO as part of their safeguarding responsibilities to ensure that College policies and procedures are effective and meet the requirements of current legislation. Any allegations relating only to adults at risk of harm will be referred to the Adult Safeguarding Lead, Walsall Council. Members of

College staff are people who are in positions of trust (PoT) and therefore any behaviour which may call that position into question will be communicated to the College and acted on.

- 4.2 **Senior Staff Member with Lead Responsibility:** The designated senior member of staff with lead responsibility for safeguarding is Andrea Packer, Designated Safeguarding Lead, Wisemore Campus, Littleton Street West, Walsall. She is a member of the College’s Senior Management Team and has a key duty to take lead responsibility for ensuring that staff are aware of issues relating to the welfare of adults at risk of harm. This includes the promotion of a safe environment for adults at risk of harm who are learning within the College or in the workplace. She will have undertaken up to date training in safeguarding as required by the [Walsall Safeguarding Children Board \(WSCB\)](#), [Walsall Safeguarding Adult Board \(WSAB\)](#) and will receive refresher training at least every two years. She will remain up to date with developments in child protection and adult safeguarding.

The designated senior member of staff is responsible for ensuring that:

- Cases of suspected abuse or allegations are appropriately referred to relevant agencies
- Advice and support to staff on issues relating to safeguarding is provided
- A record of any safeguarding referral, complaint or concern is kept, (even where that concern does not lead to a referral)
- Parents/carers/employers of children, young people or adults at risk of harm within the College have access to the College’s Safeguarding Policies
- Liaison takes place with employers and training organisations that receive children, young people or adults at risk of harm from the College on long term placements to ensure that appropriate safeguards are put in place
- Staff receive basic training in safeguarding issues and are aware of the College safeguarding procedures including preventing people from being drawn into terrorism.
- Safer recruitment practices are in place
- College works with appropriate partners to safeguard children and adults at risk of harm

The designated senior member of staff will ensure an annual report is provided to the Governing Body of the College setting out how the College has discharged its duties. They are responsible for ensuring deficiencies in procedure or policy identified by the WSCB, WSAB (or others) are reported to the Governing Body at the earliest opportunity.

4.3 **Designated Staff Members**

Designated members of staff with responsibility for child and adult protection concerns are:

Business Support	
Andrea Packer	Head of Student Services Designated Safeguarding Lead Single Point of Contact (SPOC)
Kit Rennie	Deputy Safeguarding Lead Welfare and Safeguarding Officer
Selina Harra	Deputy Safeguarding Lead Welfare and Safeguarding Officer
Jayne Holt	Assistant Principal – Learning Services Safeguarding Officer

Melanie Jones	Counsellor/Safeguarding Officer
Lyndsey Shuker	Counsellor/Safeguarding Officer
Gemma Earp	Nursery Manager Safeguarding Officer - (Nursery Children only)
Claire Dunn	HR Specialist Safeguarding Officer Allegations against staff only

These designated staff members collectively:

- Report to the senior member of staff with lead responsibility as appropriate;
- Make appropriate referrals;
- Liaise with other agencies in our partnership around children and adults at risk of harm;
- Provide advice and support to other staff on issues relating to protection from abuse;
- Have particular responsibility to be available to listen to children, young people and adults at risk of harm studying at the College or in the workplace;
- Deal with individual cases, including attending case conferences and review meetings as appropriate;
- Undergo appropriate training as required by WSCB, WSAB and receive refresher training at least every two years.

Professional curiosity is not simply about asking the question. It is about the language used, creating a trusting relationship, a safe space in which to disclose and giving time to children and young people so they do not feel pressured.

Not all members of the team will deal with referrals. They are there in an advisory capacity and to ensure communication flow to all areas of the College.

4.4 Designated Governor

Governors are briefed by the Designated Safeguarding Lead regarding yearly updates to policy, procedure and activity to maintain high standards in relation to safeguarding.

The Chair of Governors Allan Pinnegar is the College Designated Governor for safeguarding. As part of his duties he will take lead responsibility for overseeing any allegations made against the Principal (see Procedures: Section 2) and other Governors (see Procedures: Section 3) in relation to safeguarding matters. Where an allegation is made against the Chair of Governors, the Vice Chair Alan Woods will then take the lead. He is responsible for overseeing the liaison between the LADO, the Adult Safeguarding Lead, Walsall Council, Social Services and/or the Police, in connection with such allegations. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provision of information to assist enquiries.

The lead Governor will have regular updates on safeguarding matters via the Principal's termly report to Corporation.

4.5 Data Protection and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse. It is important that we recognise the importance of information sharing between professionals and local agencies. Practitioners must have due regard to the relevant data protection principles which allow them to share personal information, as provided for in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

We have a duty to process personal information fairly and lawfully and to keep information held safe and secure. However, this is not a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of students.

When students leave College, the Designated Safeguarding Lead and the Deputy Safeguarding Leads will ensure their safeguarding file is transferred to the new school or College as soon as possible, (if applicable) ensuring secure transit, and confirmation of receipt. When receiving file transfers, we will ensure key staff are aware as required, e.g. Tutors, Safeguarding Team.

When sharing information staff will take account of the [Seven Golden rules for sharing information](#).

4.6 Safeguarding and Wellbeing Committee

The Safeguarding and Wellbeing Committee meet on a termly basis and undertake the following:

1. Actively promote and embed Safeguarding and Wellbeing throughout the College's activities.
2. Review information and planning from the College's Safeguarding Team.
3. Provide a forum to strategically monitor plans for safeguarding the College Community.
4. Consider the implications of changes in legislation for the implementation of Safeguarding and Wellbeing in the College and to provide advice on any related issues.
5. Assist across College in the implementation of policies and procedure including the commissioning of training and staff development.
6. Establish working groups to investigate (as appropriate), report on and monitor the Safeguarding and Wellbeing aspects of the College's policies and procedures.
7. Monitor the College's commitment towards promoting Safeguarding and Wellbeing through its marketing and publicity activity.
8. Report to the Senior Management Team and Corporation as appropriate.
9. Receive and review key data (for students and other key aspects including staff, community, employers) in order to evaluate the impact of strategies adopted by the College.

SAFEGUARDING PROCEDURE

1 HOW TO DEAL WITH SUSPICIONS/CONCERNS OF ABUSE OR NEGLECT

1.1 Key things to remember if an adult at risk of harm tells you about possible abuse:

- Never promise confidentiality – you will have to break it, and with it the persons trust in you;
- Listen carefully and stay calm – you need to listen without making assumptions or judgements;
- Question normally and without pressure and only to be sure that you understand what you have heard;
- Do not ask leading questions or act as an investigator;
- Do not put words into their mouth;

- Reassure them that by telling you, they have done the right thing;
- Inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter;
- Find out what the adult at risk of harm would like to happen, but make them aware that you may have to act against their wishes (e.g. they may ask you not to disclose to anyone else);
- Note the main points carefully;
- Use the [Safeguarding Report Form](#) if possible to gather key information and as a record of your discussion;
- Do not investigate concerns or allegations yourself, but report them immediately to a member of the Safeguarding Team;
- Adult students have the right to make their own choices where they are capable of doing so.

1.2 Procedure for Students

There are slightly different procedures to follow for different types of student:

- Apprentices and Adults at risk of harm but if in doubt always contact a member of the safeguarding team.

1.3 Apprentices

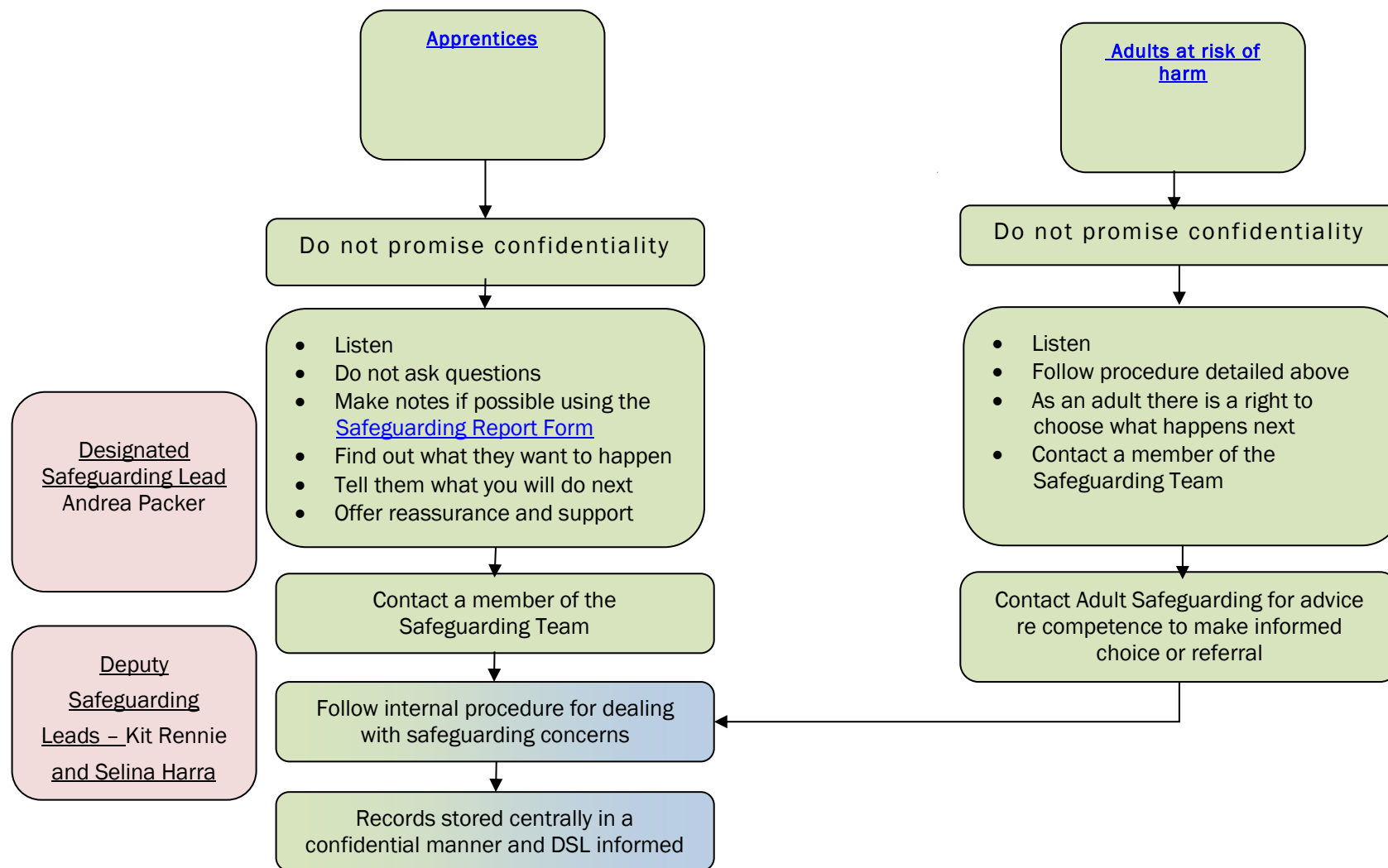
- Workplace providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding;
- Placement Officers/Assessors will carry out all risk assessments and include safeguarding discussion as part of workplace reviews with students;
- Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details;
- Staff will advise the student that action may have to be taken as a result of the disclosure. It is not the responsibility of members of staff to investigate suspected abuse;
- A written record (using the reporting form Safeguarding Report Form) of the interview will be made where possible;
- Referral to a member of the Safeguarding Team will be made immediately and in person where possible;
- Student's wishes regarding action to be taken will be noted where possible, however, the student will be made aware that this will not affect the final decision to make a referral;
- There is no need to involve other members of staff (including line managers) as this reduces confidentiality;
- Make student aware of services within the College which may be able to help them address the situation and offer support and provide information or local or national telephone helpline and counselling support;
- Where possible the Safeguarding Officer will consult the student regarding the report and their wishes and inform them of action which has or will be taken. However, depending upon the circumstance, this may not always be possible'
- Where action is decided upon which necessitates contacting Children's Services or Adult Safeguarding Unit, College procedures for referral will be followed within 24 hours of Safeguarding Team receiving the referral;
- Confidential records will be kept of all discussions relating to protection from abuse matters and will be stored electronically in a confidential manner;
- The Designated Safeguarding Lead will be informed immediately of any referrals received/made;

- Organisations seeking subcontracted work have to submit their policies and procedures as part of the PQQ process.

1.4 Adults at risk of harm

- Members of staff hearing allegations will advise the student that action may have to be taken as a result of the disclosure. It is not the responsibility of members of staff to investigate suspected abuse;
- Do not promise confidentiality and explain what might happen as a result of disclosure;
- A written record (using the reporting form [Safeguarding Report Form](#)) of the interview will be made where possible;
- Referral to a member of the Safeguarding Team will be made immediately and in person where possible;
- Student's wishes regarding action to be taken will be noted where possible however the student will be made aware that this will not affect the final decision to make a referral;
- There is no need to involve other members of staff (including line managers) as this reduces confidentiality;
- Make student aware of services within the College which may be able to help them address the situation and offer support and provide information or local or national telephone helpline and counselling support;
- Where possible the Safeguarding Officer will consult the student regarding the report and their wishes and inform them of action which has or will be taken, however depending upon the circumstance, this may not always be possible;
- Where action is decided upon which necessitates contacting Adult Safeguarding, College procedures for referral will be followed within 24 hours of Safeguarding Team receiving the referral;
- Confidential records will be kept of all discussions relating to protection from abuse matters and will be stored electronically in a confidential manner;
- The Designated Safeguarding Lead will be informed immediately of any referrals received/made;
- The adult has a right to make their own decisions if they are competent to do so in line with the [Mental Capacity Act 2005](#).
- If their competency is in doubt, contact a member of the Safeguarding Team for advice;
- If appropriate, further advice will be sought or a referral will be made to Adult Safeguarding;
- A report of the disclosure and any action taken must be recorded and the Designated Safeguarding Lead informed.

'At a Glance' Guide



Safeguarding Report Form

Staff Details

Confidentiality Statement			
Please note that this meeting is confidential. However, if information provided gives reason for us to believe that you or anyone else is at risk of harm we will need to contact relevant agencies to access support and share information with them. These may be external agencies; however, you will be notified of the process.			
Staff Details			
Name			
Date			
Time of Interview			
Referred by			
Student Details			
Full Name			
Date of Birth/Age			
Family Address			
Names of Household Members			
Child	Yes/No	Adult at risk of harm	Yes/No
Information Relating to the Incident. What did the student tell you?			

What would the student like to happen as a result of the disclosure?	
Is the student aware that this referral is being made	Yes/No
Organisation referred to	
Name of person who took the referral	
Date/Time referred to external services	

2 REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF

The procedures apply to all staff, whether teaching, administrative, management, support, supply and volunteer. Allegations of abuse against a member of staff can be defined as when a person has:

- Behaved in a way that has harmed or may have harmed an adult at risk of harm;
- Possibly committed a criminal offence against or related to an adult at risk of harm;
- Behaved towards an adult at risk of harm in a way that indicates she/he is unsuitable to work with adults at risk of harm.

2.1 Introduction

2.1.1 The College recognises that the Care Act 2014 states that “Organisations should always promote the adult’s wellbeing in their safeguarding arrangements. People have complex lives and being safe is only one of the things they want for themselves. Professionals should work with the adult to establish what being safe means to them and how that can be best achieved. Professionals and other staff should not be advocating ‘safety’ measures that do not take account of individual well-being, as defined in Section 1 of the Care Act.

2.1.2 Staff of education institutions have been found responsible for child abuse. Because of their frequent contact with adults at risk of harm, staff may have allegations of abuse made against them. Under the Mental Capacity Act 2005 (MCA) Section 44, it is an offence to harm or neglect an adult at risk of harm. The College recognises that an allegation of abuse of adults at risk of harm made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

2.1.3 However, hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career; therefore, those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way, and with appropriate external support.

2.1.4 All staff are advised that they must report worries or concerns about other members of staff through the Whistleblowing Policy or direct to Adult Services if they prefer.

2.1.5 Staff and volunteers should also feel able to raise concerns about poor or unsafe practice and potential failures in College safeguarding regime and that such concerns will be taken seriously by the senior leadership team. They can do this by contacting the Designated Safeguarding Lead or by activating the College’s Whistleblowing Policy. Alternatively, you can find information via the following link: <https://www.gov.uk/whistleblowing>

2.2 Receiving an Allegation from an Adult at risk of harm about a Member of Staff

2.2.1 A member of staff who receives an allegation about another member of staff from a child or adult at risk of harm will follow the guidelines in Section 1 for dealing with disclosure. This will ensure the child/adult needs are met.

On some occasions the concern may not arise from a direct disclosure. If observations of staff behaviour give rise for concern of inappropriateness these must be shared directly with Designated Safeguarding Lead or the Head of Human Resources.

2.2.2 The allegation about the staff member will be reported immediately to either the Designated Safeguarding Lead / Deputy Safeguarding Lead or the Head of Human Resources. In their absence, the report will go to the Deputy Principal or other member of the Executive team who will follow the steps below.

2.2.3 They will contact the Local Authority Designated Officer (LADO) for children under 18 or the Adult Safeguarding Services for adults at risk of harm to discuss referral and action. The LADO/Adult Safeguarding Lead will be contacted within 1 working day of receiving the allegation. Appropriate internal action will be taken to safeguard the child/ adult at risk of harm.

The Designated Safeguarding Lead or Head of Human Resources will inform the Principal (or designated person if the allegation is against the Principal or the Principal is off site) and they will provide details including information about times, dates, locations and names of potential witnesses where appropriate or necessary.

2.3 Initial Assessment by the Principal (or designated person)

2.3.1 The Principal (or designated person) will make an initial assessment of the allegation, consulting with the LADO, Senior Staff Member with Lead Responsibility and the Designated Governor as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the student has suffered, is suffering or is likely to suffer significant harm, the matter will be dealt with under Walsall's Safeguarding Children procedures, or in the case of adult abuse the Adult Safeguarding Unit.

2.3.2 It is important that the Principal (or designated person) does not investigate the allegation. The initial assessment will be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

2.3.3 Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or adult at risk of harm. The matter will be addressed through professional development and mentoring, or in some cases where appropriate, the College's Disciplinary Policy and Procedure.
- The allegation can be shown to be false because the facts alleged could not possibly be true, in which case the person concerned will be reassured and supported as appropriate.

2.4 Enquiries and Investigations

2.4.1 Child/Adult protection enquiries by Children's Social Care, Adult Services or the Police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. Neither the Child/Adult Protection Agencies nor the Police have power to direct the College to act in a particular way; however, the College will always assist the agencies with their enquiries.

2.4.2 The College will hold in abeyance its internal enquiries while the formal Police or Children's/Adult Safeguarding services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries will conform to the existing Staff/Governor disciplinary procedures.

2.4.3 If there is an investigation by an external agency, for example the Police, the Principal (or designated person) will normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal (or designated person) is responsible for ensuring that the College gives every assistance with the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Principal (or designated person) shall advise the member of staff that he/she may consult with a recognised Trade Union representative or work companion.

2.4.4 Following discussion with the LADO, the Adult Safeguarding Lead, the Police or other investigating agency, the Principal (or designated person) shall:

- Ensure that the parents/carers of the child or adult at risk of harm making the allegation have been informed that the allegation has been made and what the likely process will involve;
- Inform the member of staff against whom the allegation was made of the fact that the allegation was made;
- Where investigation is taking place, they will be informed of what the likely process will involve and what support may be available;
- Inform the Designated Governor of the allegation if action is required and of the investigation.

2.4.5 Written records of the action taken in connection with the allegation will be kept.

2.5 Suspension of Staff

2.5.1 Suspension will not be automatic; a member of staff may be suspended on full pay whilst an investigation is undertaken. In respect of staff other than the Principal, suspension can only be carried out by the Principal, Deputy/Assistant Principal or a designated member of the Executive Team. In respect of the Principal, suspension can only be carried out by the Chair of Governors (or in his/her absence, the Vice Chair).

2.5.2 Where a suspension is being considered Human Resources must be consulted. It is a neutral act, not a disciplinary sanction, and does not involve any prejudgement. Consideration will be given to alternatives - e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

2.5.3 Suspension will only occur for a good reason, for example:

- Where there is a cause to suspect a child or adult is at risk of significant harm;
- Where the allegations warrant investigation by the Police or potentially sufficiently serious to justify dismissal on the grounds of gross misconduct;
- Where necessary for the good and efficient conduct of the investigation.

2.5.4 If suspension is being considered, the member of staff will be encouraged to seek advice and support, for example from a Trade Union.

2.5.5 Prior to making the decision to suspend, the Principal (or a designated member of the Senior Management Team or Chair or Deputy Chair of Governors) will interview the member of staff. This will occur with the approval of the LADO where possible. In particular, if the Police are engaged in an investigation the officer in charge of the case will be consulted.

- 2.5.6 The member of staff will be advised to seek the advice and/or assistance of his/her Trade Union and will be informed that they have the right to be accompanied by a representative of a recognised Trade Union or a workplace colleague. The member of staff will be informed that an allegation has been made. It will be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to further investigation. It may be considered at this time to suspend the member of staff.
- 2.5.7 During the interview, the member of staff will be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The member of staff will be given the opportunity to consider any information given to him/her at the meeting and prepare a response.
- 2.5.8 If the Principal (or Deputy Principal or Designated Governor) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within five working days.
- 2.5.9 Where a member of staff is suspended, the Principal (or Designated Governor) will address the following issues:
- The Chair of Governors will be informed of the suspension;
 - The Governing Body will receive a report if a senior member of staff has been suspended pending investigation;
 - The detail given to the Governing Body will be minimal;
 - Where the Principal has been suspended, the Chair or Vice Chair of Governors will need to act to address the management of the College;
 - The parents/carers of the child or adult making the allegation will be informed of the suspension. They will be asked to treat the information as confidential. Consideration will be given to informing the child or adult making the allegation of the suspension;
 - Consider whether the Marketing Department needs to liaise with the Children's or Adult Services Press Officer.
- 2.5.10 Senior staff that need to know of the reason for the suspension will be informed. Depending on the nature of the allegation, the Principal will consider with the Chair of Governors whether a statement to the students of the College and/or parents/carers will be made, taking due regard of the need to avoid unwelcome publicity
- 2.5.11 The Principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities will be consulted.
- 2.5.12 The suspended member of staff will be given appropriate support during the period of suspension. They will also be provided with information on progress and developments in the case at regular intervals with approval of LADO and the Police.
- 2.5.13 The suspension will remain under review in accordance with the College disciplinary procedures.
- 2.5.14 Where suspension is instigated for something that could result in dismissal for misconduct which harmed a child or placed a child at risk, the College will refer them to the [Disclosure and Barring Service \(DBS\)](#). Referral to DBS also applies to action taken in relation to adults at risk of harm. Advice may be taken from other agencies prior to any action being taken.

2.5.15 Where an individual is dismissed for misconduct which harmed a child, adult at risk of harm or placed them at risk of harm; or resigns, retires, is made redundant or is transferred to a position which is not a childcare position in such circumstances, Walsall College has a statutory duty to refer to the DBS.

2.5.16 If the person is subject to registration or regulation by a professional body or regulator, for example by the [General Social Care Council](#), [General Medical Council](#), Ofsted etc., the LADO/Adult Safeguarding Lead will advise on whether a referral to that body is appropriate.

2.5.17 If it is decided that a member of staff who has been suspended from work can return, the College will facilitate their return to work and consider how the member of staff's contact with the child, children or adult at risk of harm who made the allegation can be best managed.

2.6 The Disciplinary Investigation

2.6.1 The disciplinary investigation will be conducted in accordance with the existing College Disciplinary Policy and Procedure.

2.6.2 The member of staff will be informed of:

- The disciplinary allegation against him/her;
- His/her entitlement to be represented by a Trade Union representative or work companion;
- The College's awareness of the personal impact the allegation may have and the support the College is able to offer e.g. counselling.

2.6.3 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted immediately and arrangements made for the member of staff to return to work.

2.6.4 The child, children or adult at risk of harm making the allegation and/or their parents/carers will be informed of the outcome of the investigation and proceedings. This will occur prior to the return to College of the member of staff (if suspended).

2.6.5 The Principal (or designated person) will consider what information will be made available to the general population of the College.

2.7 Allegations without Foundation

2.7.1 False allegations may be indicative of problems of abuse elsewhere. A record will be kept and consideration given to a referral to appropriate agencies in order that they may act upon the information.

2.7.2 In consultation with the designated senior member of staff or designate /or the designated Governor, the Principal shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection/adult protection action will be taken. Reassure them of the College's understanding of the personal impact that false allegations may have and the support the College will continue to offer.

- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child/adult at risk of harm other than the alleged victim, consideration to be given to informing the parents/carers of that child/adult at risk of harm.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- Remove allegations from member of staff's personal file.

2.8 Records

- 2.8.1 Documents relating to an investigation will be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details will be retained on the member of staff's personal and confidential file.
- 2.8.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she will be informed about the College's statutory duty to inform the DBS.

2.9 Monitoring Effectiveness

- 2.9.1 Where an allegation has been made against a member of staff, the Head of Human Resources, together with the Senior Staff Member with Lead Responsibility will, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which will be drawn to the attention of the Walsall Safeguarding Children's Board and Walsall Adult Safeguarding Board. Consideration will also be given to the training needs of staff. Any recommendations following a review will be reported to the designated Governor.

2.10. Recruitment and Selection

- 2.10.1 Walsall College aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. Walsall College is committed to safeguarding and promoting the welfare of children and adults at risk of harm, and expects its staff to share this commitment.
- 2.10.2 The Disclosure and Barring Service (DBS), was introduced on 1 December 2012, through the [Safeguarding Vulnerable Groups Act 2006](#) and [Protection of Freedom Act 2012](#). Its purpose is to reduce the risk of harm to children and vulnerable adults.
- 2.10.3 The DBS scheme defines the type of work – regulated activity. The defined roles stated within the DBS Policy, which are carried out by staff at Walsall College will meet the definition of regulated activity and our practices must comply with the legislation.
- 2.10.4 The barred list checks are an additional safeguarding check and part of a wider framework of safer recruitment practices. It enables the increased monitoring and review of criminal record related information and intelligence. It does not remove the need for DBS Disclosures, nor does it remove the need to develop and apply robust recruitment procedures, including checking identity, qualifications and references, and enquiring into career history.

2.10.5 [The Safeguarding Children and Safer Recruitment in Education](#) guidance which came into force on 1st January 2007, recommends that in addition to the various staff records which are kept as part of normal business, Colleges must also keep and maintain a single central record of recruitment and vetting checks. The College's Single Central Record (SCR) is run and stored with Human Resources.

3 REPORTING AND DEALING WITH ALLEGATIONS AGAINST NON-MEMBERS OF STAFF

There are a number of instances where Walsall College students come into contact with people as part of College activity, who are not formally employed by the College e.g. Governors, Volunteers, placement providers, taxi/community transport personnel, staff of partner organisations or other service providers.

In the event of allegations regarding non-College employed persons as defined above, who come into contact with children and adults at risk of harm on the College's behalf, the following procedure will be followed.

3.1. **Governors**

3.1.1 The person hearing the allegation will follow the Safeguarding Procedure: Section 1 for supporting the student.

3.1.2 They will immediately contact the Designated Safeguarding Lead or the Head of Human Resource who will take a written record of the allegation which is signed and dated.

3.1.3 The Chair of Governors, (or the Deputy Chair if the allegation is against him/her) and the Principal, will be contacted and informed of the allegation.

3.1.4 The Chair of Governors, with the support of the Head of Human Resource and/or Designated Safeguarding Lead, will contact the LADO and discuss the allegation if it relates to a person under 18. If the allegation relates to an adult at risk of harm, Adult Safeguarding Services will be contacted for advice.

3.1.5 If no action is required, the Clerk to the Corporation and the Chair of Governors will inform the person against whom the allegation has been made of the allegation and offer reassurance.

3.1.6 If it is decided that action is required, the Chair of Governors, and/or Director of Student Journey or Head of Human Resource will contact the appropriate agency (prior to making any contact with the Governor against whom the allegation has been made) e.g. Children's Social Services, Adult Safeguarding Services or the Police, who will then begin their own processes.

3.1.7 If action has been required, the Clerk to the Corporation and the Chair of Governors will inform the person against whom the allegation has been made of the allegation and their suspension from duty pending external investigation. They will offer information about College processes and support.

3.1.8 Suspension and subsequent College action will follow the Governors' disciplinary procedure.

3.1.9 The Designated Safeguarding Lead/Head of Human Resource will keep the Chair of Governors and the Principal informed of the progress and outcome of any investigation.

3.2 Persons not employed by the College

- 3.2.1 The responsibility to deal with any allegations against people who come into contact with our students on our behalf, but are employed by other organisations, rests with the host organisation.
- 3.2.2 Should an allegation be made, the person hearing the disclosure will follow the College procedure for supporting students (Safeguarding Procedures: Section 1.). They will report immediately to the Designated Safeguarding Lead. The Designated Safeguarding Lead will contact the relevant referral agent and discuss action in relation to the student.
- 3.2.3 The Designated Safeguarding Lead will contact the employing company to advise them of the allegation and action taken. They will be advised that until the case is resolved the person against whom the allegation has been made must not continue with College activity and that it should activate its own procedures for such circumstances.
- 3.2.4 The company should contact the College at the conclusion of any investigation.
- 3.2.5 Where no legal action is taken discussion will take place regarding the individual's potential resumption of College activity.

3.3 Volunteers

- 3.3.1 Should an allegation be made about a volunteer, the person hearing the disclosure will follow the College Safeguarding Procedure for supporting students (Section 1).
- 3.3.2 The Designated Safeguarding /Deputy or the Head of Human Resources will be contacted immediately.
- 3.3.3 The Designated Safeguarding Lead /Deputy or the Head of Human Resources will contact the LADO/Adult Safeguarding Services and discuss action.
- 3.3.4 If action is deemed to be required the Designated Safeguarding Lead /Deputy will make the referral to external agents and inform the relevant Senior Management Team member.
- 3.3.5 The Head of Human Resources will inform the volunteer of the allegation and suspend volunteering activity within the College pending investigation by the authorities.
- 3.3.6 If no action is required, the volunteer will be informed of the allegation, reminded of the College policy in relation to safeguarding, and allowed to return with supportive supervision in place.

3.4 Other Students

- 3.4.1 Should an allegation be made against another student the person hearing the disclosure will follow the College Safeguarding Procedure for supporting students (Section 1).
- 3.4.2 The Designated Safeguarding Lead and Head of Curriculum Cluster will assess immediate risk and take any necessary decision to suspend. The Designated Safeguarding Lead will seek advice from the appropriate external agents and make the referral if required. If no action is required, the College will follow its normal procedures following suspension of a

student, including the activation of the Behaviour Management and Disciplinary Policy and Procedure.

- 3.4.3 Where new activity is proposed which may affect the dynamics of the student cohort, e.g. additional recruitment of vulnerable 14-16s, safeguarding risk assessment is built into the risk assessment process.

4 SAFER RECRUITMENT TRAINING

- 4.1 All staff who participate in the recruitment process are required by the College to undergo recruitment and selection process training. In addition, every interview panel must have at least one member who has received Safer Recruitment training. Both are arranged by Human Resources. Refresher training is available, and all staff will be expected to keep themselves up to date with current practice.

- 4.2 Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or adults at risk of harm in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place.

The decision whether to employ in controlled activity someone who is barred from working with children or adults at risk of harm in regulated activity will be made after the Head of Human Resources completes the appropriate risk assessment form and consults with Designated Safeguarding Lead, the relevant Senior Management Team member and the Principal/Deputy Principal.

If the applicant has already declared on their application form or during interview they are barred from working in regulated activity, or the subsequent pre-employment checks reveal this to be the case, the individual must not be allowed to start employment until the decision has been made by the above panel. To do so, is a criminal offence.

4.3 Recruitment and Selection Process

The College's Safer Recruitment and Selection Policy sets out the recruitment and selection processes currently used by the College. Recruitment and Selection Procedures apply to all staff and volunteers who may work with children, young people and adults at risk of harm.

Vacancies are advertised widely in order to ensure a diversity of applicants and make clear the requirements for Disclosure and Barring Service (DBS) checks.

The post or role will be clearly defined and the job offers will be made subject to satisfactory completion of pre-employment checks which include:

- Receipt of two satisfactory written references provided by past employers, one of which must be from a present or most recent employer;
- Verification of identity and the provision of original documents as required by the Disclosure and Barring Service;
- DBS checks are sought on appointment and updated every 3 years as appropriate;
- A clear check against the DBS Barred Children's List, if applicants are working in regulated activity;
- A variety of selection techniques (e.g. qualifications, previous experience, and interview) are also used.

The College's interview process includes a specific question relating to safeguarding.

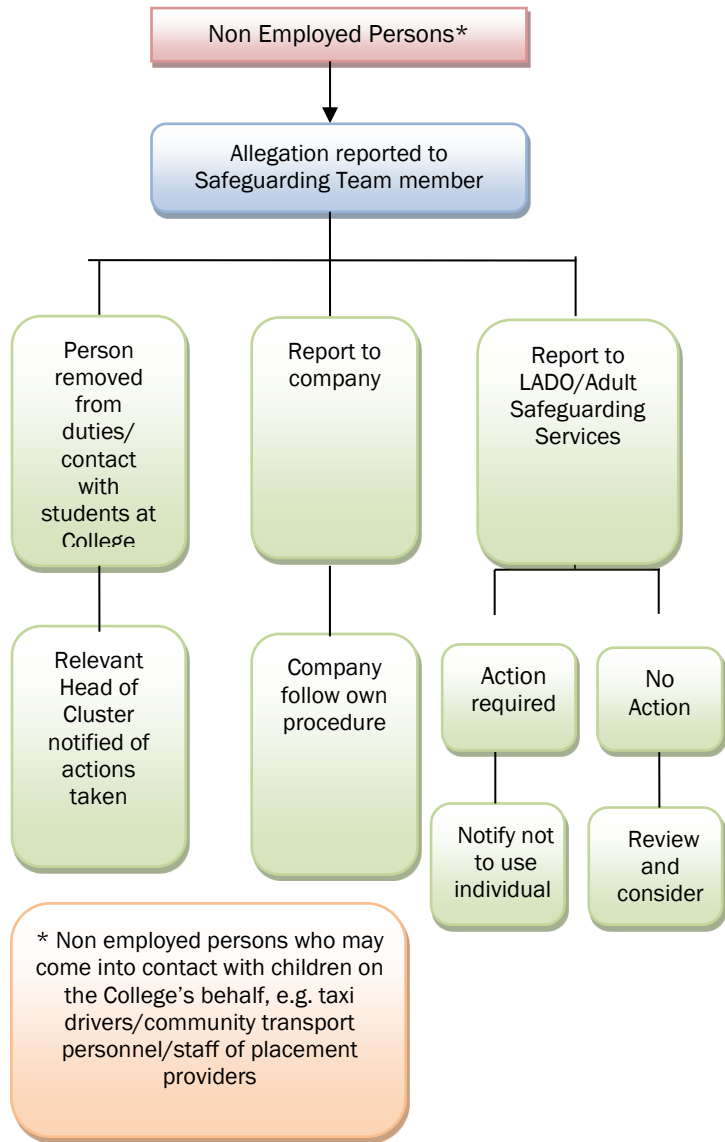
If previously non-disclosed criminal/police information is identified by the DBS Disclosure, a member of Human Resources will discuss this with the person seeking the position, before discussing with the members of the interview panel, to determine whether withdrawing the conditional offer of employment is necessary.

For overseas appointees, additional checks will be made against criminal records information from countries where the individual has lived or worked.

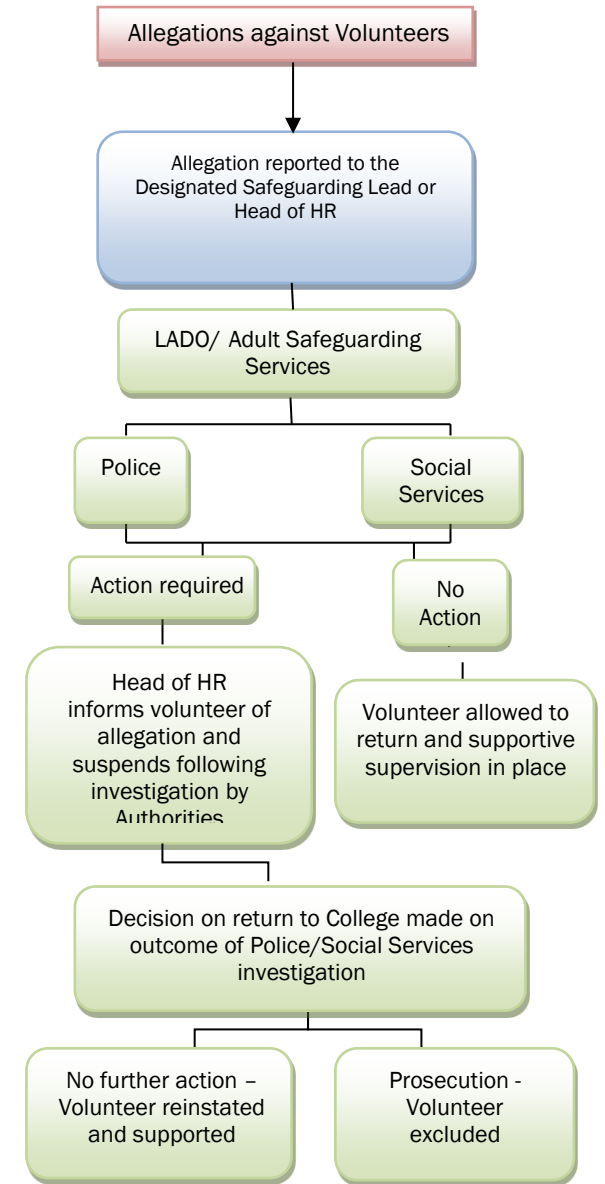
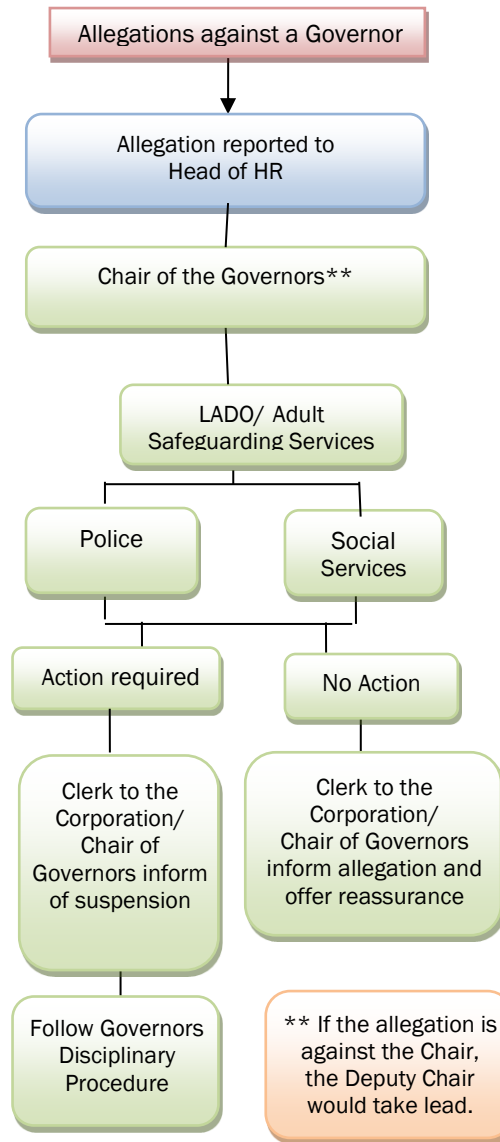
If a candidate is to be employed in regulated activity, but is not currently working, checks will be made, including a full reference, with the school, FE College or local authority at which they were most recently employed, to confirm details of their employment and reason for leaving. All required checks will be held by the Human Resources department in a Single Central Record (SCR).

Safeguarding Policy and Procedure

'At a Glance' Guide



*CTU in cases of radicalisation



Glossary of terms

Child: a young person under the age of 18 years.

Adult at Risk of Harm: Any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

Section 42 Enquiry: An enquiry is any action that is taken (or instigated) by a local authority, under Section 42 of the Care Act 2014, in response to indications of abuse or neglect in relation to an adult with care and support needs who is at risk and is unable to protect themselves because of those needs.

Early Help Assessment: Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Full Early Help guidance can be accessed via www.mywalsall.org

LADO – Local Authority Designated Officer: The Local Authority must appoint a Designated Officer (LADO) whose responsibility it is to be involved in the management and oversight of individual cases which fall within this procedure, providing advice and guidance to employers and voluntary organisations, liaising with the Police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistently, and with a thorough and fair process.

Designated Safeguarding Lead: each partner should have a Designated Safeguarding Lead (or, for health provider organisations, named professionals) for safeguarding. Their role is to support other professionals in their agencies to recognise the needs of children, including rescue from possible abuse or neglect. Designated safeguarding roles should always be explicitly defined in job descriptions. Professionals should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively and undergo training to provide them with the knowledge and skills required to carry out their role. They should liaise with staff on matters of safety and safeguarding.

Significant Harm: The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

Significant Harm is any Physical, Sexual, or Emotional Abuse, Neglect, accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life.

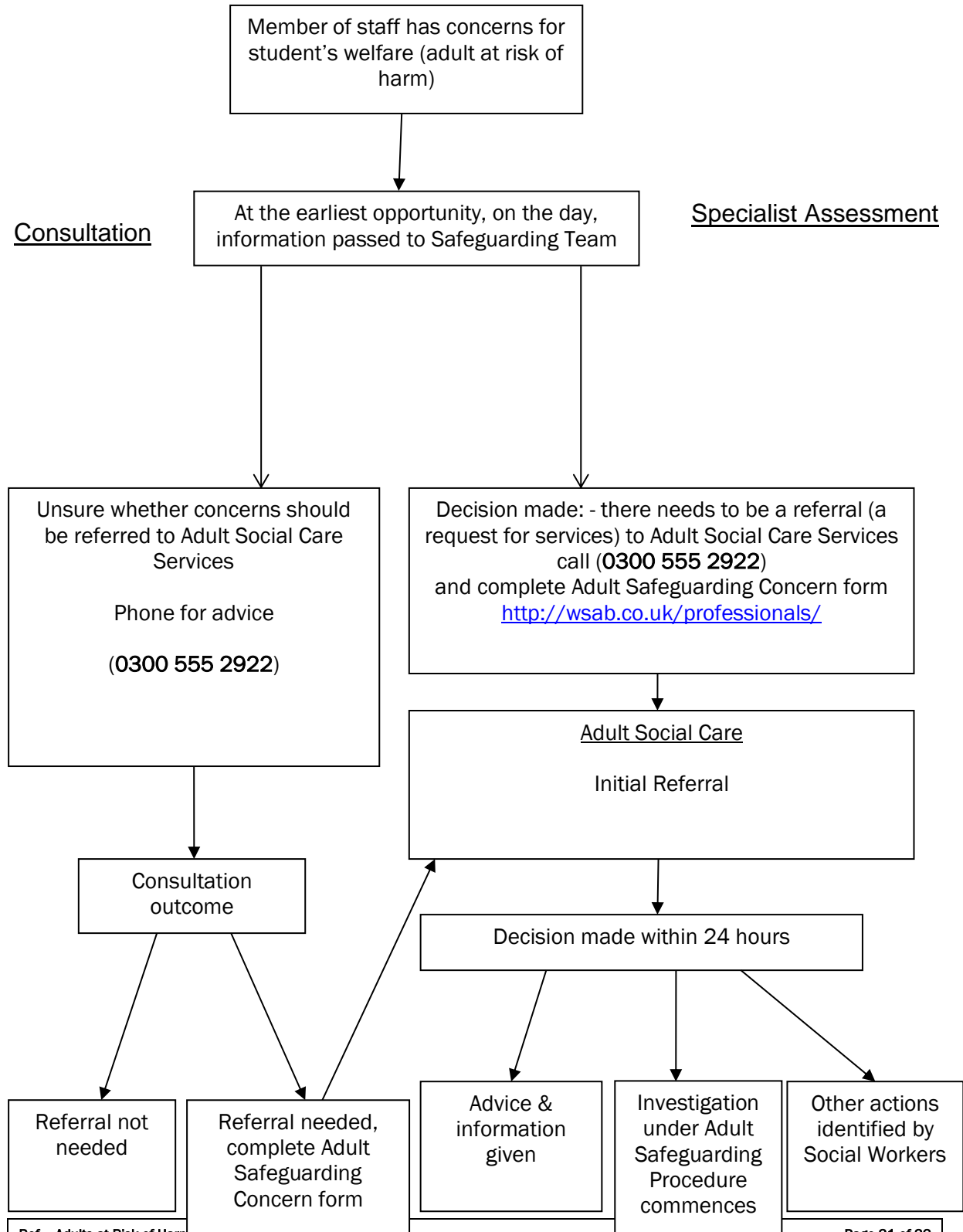
Harm is defined as the ill treatment or impairment of health and development. This definition was clarified in section 120 of the Adoption and Children Act. Suspicions or allegations that a child is suffering or likely to suffer Significant Harm may result in a Core Assessment incorporating a Section 47 Enquiry.

There is no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child's development.

Walsall Safeguarding Children Board (WSCB): Revisions to “Working Together to Safeguard Children” have been made to reflect the legislative changes introduced through the “Children and Social Work Act 2017”. This act replaces Local Safeguarding Children Boards with new, local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police and clinical commissioning groups). The Act places a duty on those partners to decide for themselves and relevant agencies they deem appropriate, to work together for the purpose of safeguarding and promoting the welfare of children in their area.

Walsall Safeguarding Adults Board: Part 1 of the Care Act 2014 established a clear legal framework for how local authorities and other statutory agencies should protect adults with care and support needs who are at risk of abuse or neglect. The duties include the requirement for the Local Authority to establish a Safeguarding Adults Board. Statutory members are the Local Authority, Clinical Commissioning Groups and the Police. The Board must arrange Safeguarding Adult Reviews and publish an annual report and strategic plan. These initiatives are designed to ensure greater multi-agency collaboration as a means of transforming adult social care.

Adult Safeguarding referrals in Walsall



Managing Allegations against Staff and Volunteers

