



Fairfield School of Business

Safeguarding Policy

Version 5.2

Approved by the Board of Governors

Last Amendment: August 2020

The Safeguarding Policy sets Fairfield School of Business' commitment, as well as its statutory duty, to safeguard and promote the wellbeing of all students, staff, agency staff, consultants, visitors and volunteers.

This policy has drafted with due regard for the following legislation and/or external quality assurance frameworks:

- i. Safeguarding Vulnerable Groups Act 2006*
- ii. Equality Act 2010*
- iii. Counter Terrorism and Security Act 2015*
- iv. Data Protection Act 2018*
- v. EU Regulation 2016/679 General Data Protection Regulation ("GDPR")*



Document Information

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To report a concern or seek further advice, contact the Campus Designated Safeguarding Officer (DSO):

- **Croydon Site:**

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- **Digbeth Site:**

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(Female) Masooma Raza masooma.raza@fairfield.ac +44(0) 121 634 1590 ext.241

If the above cannot be contacted for any reason, concerns should be directed to the School's Designated Safeguarding Lead (DSL): Byron White: byron.white@Fairfield.ac

Naveed Shah and Atif Mannan are additionally the Prevent Duty officers for their respective campuses; Byron White is the Designated Prevent Lead.

Concerns about the wellbeing of a School employee or contracted worker should additionally be reported to the human resources: hr@fairfield.ac



1. Introduction

- 1.1. The Fairfield School of Business (FSB)'s Safeguarding Policy aims to help people to be aware of, and feel confident about dealing with safeguarding concerns by:
 - outlining the School's safer recruitment process;
 - affirming a commitment to training and raising awareness;
 - setting out a clear process that should be followed when raising and dealing with concerns relating to safeguarding;
 - signposting individuals to internal or external contacts and sources of information to obtain help and advice
- 1.2. Above all, this policy supports the School's aim of developing a positive culture and learning environment in which students and staff are protected from harm or abuse.
- 1.3. This policy applies to all staff and students of the School, including those that do not have a specific role in relation to safeguarding matters, and visitors, volunteers and contractors engaged by the School who may come into contact with a child or adult at risk as part of their work or activities.
- 1.4. The Scope of this policy extends to risks of harm that exist off School premises; where someone needs to report a suspected risk of harm outside of the School, they can use the processes outlined in this document to raise a concern in order to refer the individual for appropriate support.
- 1.5. This policy is distinct from the School's *Health and Safety Policy* and *Security Policy*, which deal with the mitigation of risks to the immediate physical safety of persons in the on the School's premises.

Safeguarding Children and Vulnerable Adults

- 1.6. FSB recognises that it has a duty of care for all students and accepts a duty to safeguard children and adults at risk against abuse. Furthermore, the School is aware of its duty of care to staff and in particular its teaching staff who may at times be subject to hostile behaviour or false allegations of abuse.
- 1.7. The School is an inclusive institution and is committed to equality of opportunities in its staff and student recruitment practices. Staff will potentially come into contact with, or be responsible for the wellbeing of vulnerable adults (someone who is or may be for any reason unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation); the



School will ensure that it maintains a safe environment for vulnerable adults and will provide all reasonable adjustments to accommodate their specific needs.

- 1.8. Whilst the School offers learning opportunities to persons of 18+ years only and students are not usually permitted to bring children (considered to be anyone under the age of 18) to the campus, it is accepted that staff will likely may at times come into contact with children either on or in the vicinity of campus. Children will require the supervision of their legal guardian at all times whilst on School premises; where someone is concerned about the wellbeing of a child, they should seek advice immediately from the Designated Safeguarding Officer (See page 2).

Raising Concerns about an Individual's Mental Health

- 1.9. A mental health issue can have a profound effect on an individual's quality of life. FSB will promote awareness of the issue of mental health and promote a culture where people are encouraged to seek help where they have a concern relating to mental health. FSB understands that a mental health problem can seriously impair academic performance and affect a student's ability to successfully complete their programme. An employee may also be inhibited in the performance their duties by a mental health issue, and this may have an adverse effect on essential business activities.
- 1.10. The procedures for raising and responding to concerns within this policy extend to individuals suffering from a mental health issue, or those who are concerned about the mental wellbeing of another.

The Prevent Duty

- 1.11. This policy implements the responsibilities for HE/FE providers set out in the *Counter Terrorism and Security Act 2015* to ensure that safe recruitment and management practices are in place to safeguard our students, staff, agency staff, consultants, visitors and volunteers from harm and from the risk of radicalisation.
- 1.12. The School has a dedicated Prevent Duty Policy in place, indicating how the institution will implement the requirements of the Duty across its provision.

2. General Safeguarding Principles

- 2.1. FSB will ensure that:



- 2.1.1. it is responsible and accountable for the safety and wellbeing of individuals with whom it deals;
- 2.1.2. there is a clear and accessible procedure in place for anyone to report a safeguarding concern;
- 2.1.3. staff are briefed and trained of safeguarding and Prevent Duty themes, in manner appropriate to their role within the School, and that they know how to respond in the event a disclosure of abuse is made to them;
- 2.1.4. there is clear guidance for staff in safely sharing information about individuals at risk internally and externally with the relevant authorities;
- 2.1.5. all safeguarding concerns raised are taken seriously and where required, reported to the relevant authorities without undue delay;
- 2.1.6. procedures are in place to check the suitability of all staff and students who may be required to supervise or interact with children or vulnerable adults; these may include but are not limited to criminal record checks with the Disclosure and Barring Service;
- 2.1.7. risk assessed action plans are in place where members of the School are in regular contact with any children or vulnerable adults and to make sure they are aware of all support available to them provided by both the School and external authorities;
- 2.1.8. student selection procedures have due regard for the need to protect the student body from individuals who may pose a risk of harm to others

3. Safeguarding Roles and Responsibilities

- 3.1. All staff and students are responsible for promptly reporting any suspicions that an individual may be at risk of harm to their Designated Safeguarding Officer (DSO), delay, and in accordance with the School's Information Sharing Procedures (See Appendix C); if the DSO cannot be contacted for any reason, the concern should be reported the Designated Safeguarding Lead (DSL) – contact information is on page 3
- 3.2. Each campus is placed with a male and female DSO who report safeguarding concerns to a Designated Safeguarding Lead (DSL); the DSL provides guidance on the matter and engages the person concerned where necessary.
- 3.3. The CEO is the School's Safeguarding and Prevent Governor; they are accountable for the safety and wellbeing of the School's students, staff, agency staff, consultants, visitors and volunteers; they will guide the School's Executive Committee in the development of policies and procedures for mitigating risks associated with safeguarding and the Prevent Duty.



3.4. The Executive Committee (EC) is responsible for liaising with safeguarding and Prevent Duty stakeholders in the development of policies, procedures and training and awareness activities supporting the School's Safeguarding principles; the EC will ensure:

- Oversight of institutional safeguarding is maintained;
- All staff members are aware of this policy and the procedures for reporting concerns about individuals at risk of harm;
- All staff members are aware of their respective roles and responsibilities in upholding this policy;
- Staff members are appropriately trained and briefed on how to spot individuals at risk of harm;
- A lessons learnt approach is adopted, whereby recorded safeguarding incidents inform the review and refinement of practices;
- Appropriate referrals to external support agencies and prevent partners are made in a timely fashion.

3.5. The School will appoint a Designated Safeguarding Lead (DSL), who will oversee the implementation of the Safeguarding Policy and ensure that each campus has a male and a female Designated Safeguarding Officer (DSO) in place, as well as fielding enquired about safeguarding protocols and information sharing. The DSL will:

- Champion awareness of safeguarding issues and changes of policy with the wider staff and student body;
- Liaise directly with external agencies and Prevent Duty partners on safeguarding matters and ensure all contact information is current;
- Upon receiving a disclosure of a suspected risk to an individual's wellbeing, make an initial assessment about the level of risk involved and prepare a report for senior safeguarding stakeholders on the case;
- Maintain accurate detailed written records of all cases, referrals and concerns and keep them secure;
- Feedback to disclosers as appropriate.



NB: The DSL may also act as the Designated Prevent Lead (DPL); a single point of contact for concerns raised relating to the Prevent Duty and the need to prevent individuals from being drawn into terrorism.

3.6. The Human Resources Team is responsible for:

- carrying out background checks on prospective employees relevant to the nature of contact they will have with students, which may include DBS checks where required;
- ensuring staff training on safeguarding and prevent duty themes is duly completed by all required participants and that records of training are complete and up to date;
- issuing ID badges to all new employees, contractors and visitors working in any campus; when an employee or contractor leaves the business, the badge will be returned to HR and destroyed
- Making referrals as appropriate for occupational health-related matters
- Presiding over investigations into instances of staff misconduct which have led to safeguarding concerns and determining whether an employee should be suspended pending investigation
- Further the above HR must make suitable arrangements to protect staff members against allegations of abuse which are false or are unproven.

3.7. Line Managers have a duty of care to the staff members working in their teams and should be vigilant to anything that may give rise to concerns about an individual's wellbeing. Line Managers should also ensure that working practices within their teams do not put staff members at risk and that their staff are duly supported, professionally and emotionally.

3.8. Course Leaders share the duty of care of Line Managers; they must additionally have oversight of interactions between their teaching staff and students, particularly where they may come into contact with vulnerable adults or children.

3.9. Course leaders may additionally preside over investigations into instances of student misconduct which have led to safeguarding concerns and determine whether an employee student should be suspended pending investigation

3.10. IT Services are responsible for ensuring internet access via School IT networks restricts access to harmful web content with the use of reputation-based web filters. More information can be found in the IT Security Policy.



- 3.11. Security and Reception staff are responsible for controlling access to campus buildings by staff and students and will do this by checking ID badges. They will respond promptly to security incidents, should they occur.
- 3.12. Operations and Maintenance staff are responsible for ensuring campus buildings are adequately equipped with security and reception staff, CCTV, alarm systems, building accessibility features and communication equipment.
- 3.13. Any staff, students or student representatives arranging an external speaker visit or off-campus event are responsible for complying with the School's *External Speakers and Events Policy*.

4. Reporting a Concern

If there is grave or immediate danger to life the correct procedure is to phone 999 for the emergency services and then alert security staff, then notify the Principal and Campus Designated Safeguarding Officer (See page 2)

- 4.1. Anyone who is concerned about the wellbeing of an individual or feels they have been subject to some form of abuse, should approach one of the campus' Designated Safeguarding Officers (DSO) at the earliest opportunity. If the DSO is unavailable or a disclosure concerns them, the disclosure should be directed to the Designated Safeguarding Lead (see contacts on page 2).
- 4.2. Discretion should be used if approaching the person directly before contacting the DSO, however, it is preferable to try to find out as much as possible before a disclosure is made and to gain consent from an individual to share information about them, which may be of a sensitive nature.
- 4.3. If a disclosure is made to a member of staff, they should always:
 - Treat the disclosure seriously
 - Listen carefully to what is disclosed and make notes if possible, or immediately afterwards and keep all such records confidential,
 - Remain calm and not express shock or surprise,
 - Try to gain as much information as possible but avoid interrogating the discloser,
 - Try to get the individuals consent to refer the matter to the DSO
- 4.4. Confidentiality should never be offered as this may not be in the discloser's interests and the person receiving the disclosure may have to fulfil a duty to pass on information they receive concerning someone's safety or any potentially criminal activity.



- 4.5. If a person suspects an individual is at risk but does not have their consent to share information about them, or the person is concerned about approaching that individual directly, they can share information internally with the DSO on the basis that it may be harmful not to.

Where in doubt an information sharing procedure is included in Appendix C.

Note: If the issue is in fact a health and safety matter and requires urgent attention, *i.e.* ‘an accident waiting to happen’, in which case the building’s Office Manager or Health and Safety Representative should be immediately notified. Such issues would include (but are not limited to):

- slip / trip / fall or other environmental hazards;
- unrestricted access to unsafe service / maintenance areas;
- unguarded entrances;
- damaged or missing safety equipment;
- unaccompanied children;
- hygiene issues

5. Procedural Approach

- 5.1. Upon receiving a disclosure concerning the wellbeing of an individual, the DSO will try to gather more information about the issue and present an initial risk assessment to the Principal and the Designated Safeguarding Lead (DSL). Where the issue affects a member of staff, a senior HR officer will be involved.
- 5.2. The Principal, the DSL will jointly consider the case to determine the most suitable means of supporting the individual at risk; this might take the form of internal support provisions and monitoring under the appropriate School policies, or it might be necessary to refer the person to an external support agency.
- 5.3. The initial risk assessment may prompt a formal investigation of the matter, where it is felt the risk could affect other people.
- 5.4. The DSL will coordinate agreed actions and liaise with any external third parties in supporting the individual, and feedback as appropriate to the discloser.
- 5.5. The School reserves the right to take action under its disciplinary procedures should it later receive information that suggests that its standards of conduct may have been breached. The School has a duty under the *Safeguarding Vulnerable Groups Act 2006* to report staff or students who are dismissed as a result of safeguarding concerns to the Disclosure and Barring Service, as well as any relevant authority or professional body.



6. Records

- 6.1. The DSL maintains a record of every incident involving suspected or actual safeguarding concerns. These records are confidential and ordinarily they are accessible only by the Designated Safeguarding Officer. Where it is in the best interests of a vulnerable person for any record to be disclosed to other agencies, then that record will be carefully disclosed in line with the School's information sharing procedure (See Appendix C).
- 6.2. The School keeps a single record, listing all of the adults who work at the School in roles which involve contact or potential contact with vulnerable persons as employees or as volunteers, and the date and outcome of any disclosure check(s) made in relation to each person.
- 6.3. Written records of any safeguarding concerns will be retained in accordance with the School's data retention schedule. Such written records will be held separately from a student or member of staff's personal records.

7. Training and Support

- 7.1. Staff will receive briefing and training at their induction appropriate to the nature their safeguarding roles within the School.
- 7.2. Safeguarding and Prevent Duty related training activities will be determined for each role by the Executive Committee with due regard for all applicable laws and statutes; training activities will be administered and monitored by the Human Resources Team.
- 7.3. All staff will be required to engage with specific training to raise awareness of their responsibilities under the Prevent Duty; this training will involve an assessed component for which staff must demonstrate satisfactory understanding of Prevent themes.
- 7.4. Refresher training will be provided to staff every 3 years.
- 7.5. Staff and students will have access to reference materials relevant to their safeguarding duties, identifying risks and spotting signs of abuse, and information sharing.
- 7.6. Further to 7.5, staff or students with queries about the School's provisions for safeguarding individuals from harm or the Prevent duty, may contact the Designated Safeguarding Lead for information.



8. Safe Recruitment of Staff

- 8.1. All new staff arriving to work regularly with vulnerable adults are first subject to Disclosure and Barring Scheme procedures under the *Safeguarding Vulnerable Groups Act 2006* and must be registered with the Independent Safeguarding Authority. No person on the Disclosure and Barring Services' barred list will be permitted to work at the School in any capacity that involves contact or potential contact with children or vulnerable persons.
- 8.2. Disclosure checks are essential but not comprehensive and can soon expire. Existing staff will register with the Disclosure and Barring Service, when required by law to do so. References and identity checks will be sought for new employees and risk assessments and ongoing performance monitoring may also be carried out by the HR Team.
- 8.3. Staff or students who are found to be involved in misconduct with vulnerable persons may be prosecuted and/or be subjected to internal disciplinary proceedings; where such misconduct has been found to have occurred, the School will have a duty to share information about such individuals with the Disclosure and Baring Service, as well as any other relevant agency.

9. Monitoring, Evaluation and Review

- 9.1. The Designated Safeguarding Lead will record any incidents relating to safeguarding concerns and will report them in an anonymised report to the Executive Committee on a yearly basis. This report will be confidential and if any concerns or patterns of abuse emerge these will be dealt with appropriately.
- 9.2. The DSL's report will be used to drive a 'lessons learned' approach to policy development and risk assessment.
- 9.3. This policy will be reviewed and updated periodically by the Executive Committee in consultation with safeguarding and Prevent stakeholders; proposed changes to it will be reviewed and ratified by the School's Board of Governors.



Appendix A: Types of Abuse and Spotting the Signs

Abuse is the mistreatment of a person, which either deliberately or unknowingly causes harm, threatens their life or violates their rights. Abuse can vary from treating someone with disrespect in a way which significantly affects the person's quality of life, to causing actual physical suffering.

Recognising abuse is not easy and it is not the responsibility of School employees, volunteers or students to decide whether or not abuse has taken place or if an adult has been harmed or is at risk of harm. They do, however, have a responsibility to act if they have a concern about a person's welfare or safety, or a disclosure of abuse has been made to them.

People may be reluctant to disclose abuse occurring to themselves or to others for any number of reasons, the most common reasons being embarrassment, social stigma or fear of reprisal. Sometimes people are simply not aware that what is being done to them is considered abuse and is wrong, or they feel that for some reason they deserve it.

The signs of abuse in adults are varied, some forms of abuse may not be visible at all. The following details the type of abuse that may occur and some of the tell-tale signs that may accompany them.

Evidence of any one indicator from the following lists should not be taken on its own as proof that abuse is occurring. However, it should alert staff to make further assessments and to consider other associated factors. The lists of possible indicators and examples of behaviour are not exhaustive, and people may be subject to a number of abuse types at the same time.

- **Physical abuse:** physical harm caused by hitting, slapping, pushing, kicking, biting, violently retraining, etc.

Signs of physical abuse may include

- bruises
- broken or fractured bones
- burns or scalds
- bite marks
- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from suffocation or poisoning

Victims might try to conceal such injuries with clothing or accessories.

- **Psychological or emotional abuse:** causing someone mental and emotional distress by using threats, humiliation, control, intimidation, harassment, verbal abuse, or other forms of bullying behaviour.



A person suffering psychological or emotional abuse might:

- suddenly change their behaviour
 - develop low confidence or low self-assurance
 - struggle to control their emotions
 - show sudden weight loss or weight gain
 - have difficulty making or maintaining relationships / friendships
 - have extreme outbursts
 - seem isolated and withdrawn
 - lack social skills
 - suffer panic attacks or emotional breakdowns
 - exhibit signs of depression
 - show evidence of self-harm (usually cutting)
- **Sexual abuse:** any behaviour of a sexual nature which is unwanted and takes place without consent or understanding including rape and sexual assault or simulated sexual acts.

Victims of sexual may exhibit some of the indicators associated with physical or psychological abuse. Additionally, they may:

- not want to be touched or shy from physical contact
 - be protective of their personal space
 - be in apparent difficulty walking or sitting
 - show uncharacteristic use of explicit or obscene language
 - suddenly change in appearance
 - become confrontational
 - show fear or aversion towards a particular individual
- **Financial or material abuse:** stealing or denying access to money or possessions.

Indicators someone is being financially or materially abused may include

- Missing personal possessions
- Having difficulty with finances
- Appearing malnourished and/or dishevelled
- Being overly protective of things they own
- Begging and borrowing heavily
- Resorting to petty theft
- Low engagement / absence



- **Neglect:** the ongoing failure to meet a person's basic needs which may arise from a disability and/or learning difficulty.

Indicators of neglect may include

- Evidence of pain or discomfort particularly associated with a physical injury of disability.
 - Being very hungry, thirsty or untidy
 - deteriorating health
- **Domestic Violence:** including psychological, physical, sexual, financial, emotional abuse and honour-based violence.

Signs of domestic abuse may include any of the above characteristics.

- **Genital mutilation:** medical procedures carried out on a person's genitals which have no medical benefit and are performed against their will. Such procedures are illegal in the UK and are performed without license by persons who often have no formal medical training.

Signs of genital mutilation in both men and women may be similar to some of those exhibited by victims of sexual abuse; other indicators may include

- prolonged absence from studies
 - difficulty walking, standing or sitting
 - facial expression indicating clear pain or discomfort
 - appearing quiet, anxious or depressed
 - asking for help – though they might not be explicit about the problem because they're scared or embarrassed
- **Discriminatory abuse:** treating someone in a less favourable way and causing them harm due to their age, gender, sexuality, disability, ethnic origin, religion or any other particular characteristic that constitutes a protected characteristic under the *Equality Act 2010*

People who suffer discriminatory abuse may naturally express anger, indignation, frustration or fear and anxiety. They may also become quiet and withdrawn and feel unconfident about addressing the matter for fear of reprisal.

It is important that the School provides an environment where people can feel confident about raising any concern without fear of being treated less favourably for having done so.

In addition to the above, staff at the School should be aware of the potential exploitation of persons. Exploitation is the action or fact of treating someone unfairly in order to benefit from them. There are



many forms of exploitation including, but not limited to the prostitution of others or other forms of sexual exploitation, forced labour or service, slavery or practices similar to slavery, servitude (collectively 'Modern Slavery'). Exploitation may also take the form of radicalisation

Where FSB delivers the training portion of an apprenticeship, or takes on an apprentice, it will take steps to ensure that these experiences are of genuine value to the apprentice and are not a means to free labour or any other form of exploitation. This will include structured due diligence and risk assessment of companies with whom FSB offers work-based learning opportunities, as well as embedded reporting mechanisms through which to raise concerns.

Anyone who suspects that a student's work placement is not of genuine value to their learning experience, and that the student is being exploited should report their concern to the Course Leader and the Designated Safeguarding Officer immediately.

The Prevent Duty

The School has a duty under the *Counter Terrorism and Security Act 2015* to have due regard to prevent people of all ages being radicalised or drawn into terrorism.

- **'Extremism'** refers to expression of views which may deny rights to any group or individual and can be manifested as racism, homophobia, far right- or left-wing ideology and any religious extremism. The Counter Terrorism and Security Act 2015 defines extremism as the 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. It may also refer to calls for the death of members of the British armed forces.
- **'Radicalisation'** refers the act or process of making a person more favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Some young people and adults at risk of harm may be vulnerable to radicalisation or being coerced into adopting extreme views of any sort, be they political, religious, economic or environmental, etc.
- **'Terrorism'** is a threat or physical act of violence for the purpose of advancing a political, religious, racial or ideological cause.

Radicalisation can be difficult to detect. Signs that may indicate a person is being radicalised include:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use



The School's approach to dealing with radicalisation and making referrals to local multi-agency support panels (known as a CHANNEL referral) differs to its procedures for responding to other suspected safeguarding risks.

Any person who suspects that a person is in danger of radicalisation, or that extremist influences are present within the School or its vicinity should contact the **Designated Prevent Lead** without delay: byron.white@FSB.ac

For More information please refer to the School's Preventing Radicalisation and Extremism Policy.



Appendix B: Guidance on Dealing with to a Disclosure of Information

If a disclosure of abuse is made to you...

DO:	DON'T:
Stay calm	Panic
Act on the disclosure promptly	Delay
Recognise your own feelings, but keep them to yourself	Express shock or embarrassment or other opinions about what you are told
Use language that they can understand	
Reassure them that: <ul style="list-style-type: none"> • he/she has done the right thing in telling you • he/she is not to blame • you believe he/she is telling the truth 	<ul style="list-style-type: none"> • Probe for more information • use leading questions
Ask open questions, e.g. "what happened?"	Ask presumptive questions, e.g. "did Charlie do this?"
Listen carefully	Make them repeat the story
Record what they are saying and keep this set of notes. If you do not have writing materials to hand, do this immediately after you have finished talking.	
Explain what you will do next (i.e. tell your line manager or Designated Officer) in a way that is appropriate to their age and emotional state.	Promise confidentiality to them
Report to your line manager and/or Designated Officer	Approach the person against whom the allegation has been made or discuss the disclosure with anyone other than the DSO or other relevant personnel.
Seek advice and support for yourself. (Advice on providers is available from the Designated Officer)	

Remember: how you react may mean the person telling or not telling his/her story.



Appendix C: Guidance on Sharing Information about Individuals ‘At Risk’

Sharing information about individuals is an intrinsic part of the School’s Safeguarding Procedures; failure to disclose information where an individual is suspected of being at risk of harm or radicalisation can have serious consequences for that individual and potentially for the School. However, the sharing of information itself can pose a risk to individuals if not done in a controlled and appropriate way.

The following guidance is intended to help staff members to understand when and how to share information about individuals who may be at risk of harm, and to feel confident in being able to do so.

Data Protection legislation and the Human Rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of persons at risk of harm. The School must take responsibility for sharing the information it holds and cannot assume that someone else will pass on information, which may be critical to keeping someone safe.

In sharing information about individuals considered to be ‘at risk’, the School will adhere to the “*Golden Rules to Sharing Information*” set out in the UK Government’s publication:

*Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers*¹

Whilst higher education providers are not among the key organisations for whom this guidance has been developed, the guidance provides a sound framework for sharing information legally and in a responsible way.

Where sharing information about an individual, the School will always:

1. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
2. Seek advice from other practitioners [or the School’s Data Protection Officer] if there is any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf



3. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the *GDPR* and *Data Protection Act 2018* you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
4. Consider safety and well-being: information sharing decisions will be based on considerations of the safety and well-being of the individual and others who may be affected their actions.
5. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure information shared is necessary for the purpose of sharing it, sharing only with those individuals who need to have it, that it is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
6. Keep a record of decisions made and the reasons for them – whether the decision is to share information or not. Record what is shared, with whom and for what purpose.

Staff members should observe the following principles when sharing information about an individual; the information shared must be:

✓ **Necessary and proportionate:**

When taking decisions about what information to share, staff should consider how much information they need to release. Not sharing more data than is necessary to be of use is a key element of the *GDPR* and *Data Protection Act 2018*, and staff should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

✓ **Relevant:**

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

✓ **Adequate:**

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.



✓ **Accurate**

Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

✓ **Timely**

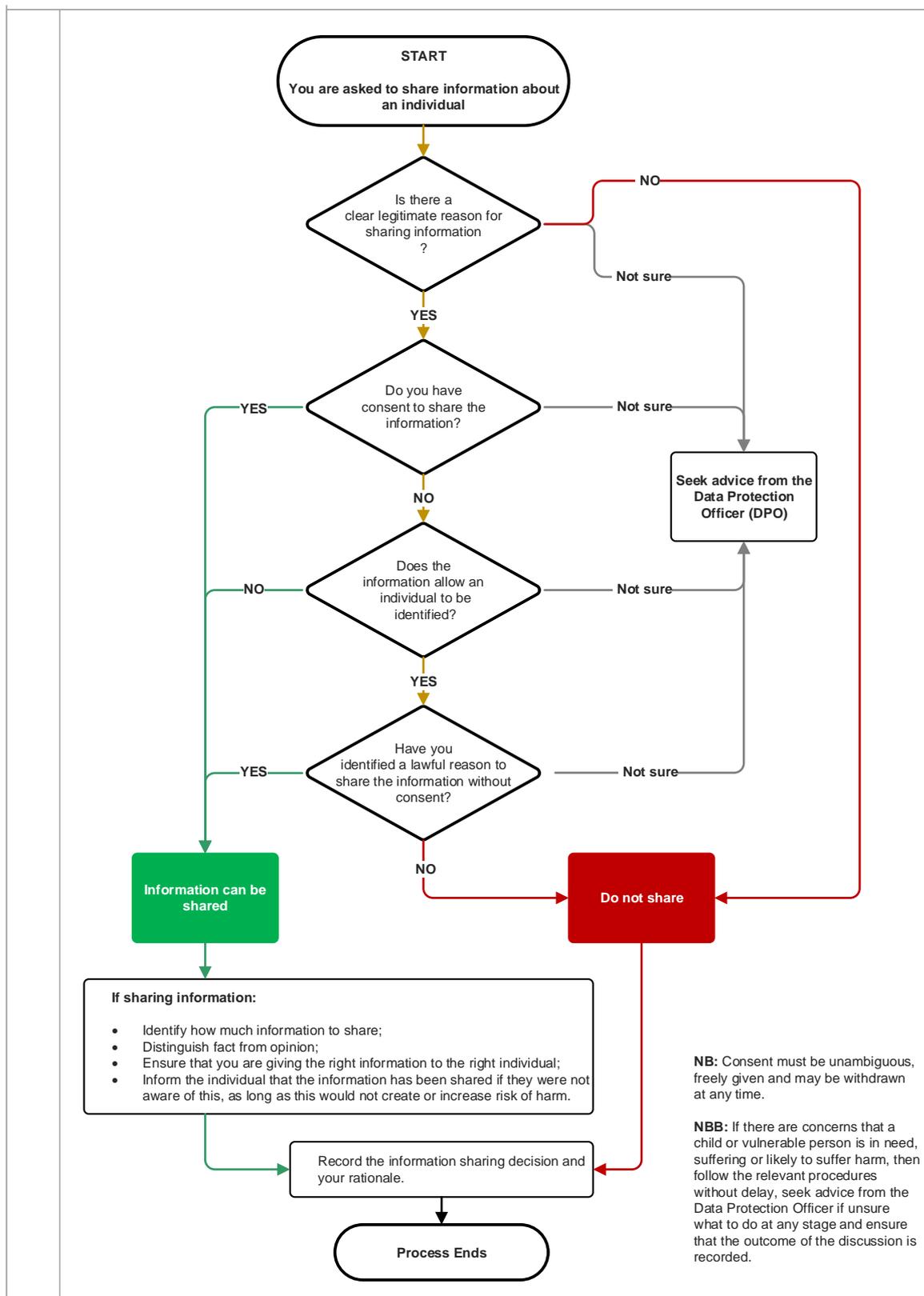
Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young person at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

Where in doubt about any aspect of the above, Staff should contact the School's Data Protection Officer: byron.white@FSB.ac

(See overleaf for information sharing procedure)



Flowchart Showing How and When to Share Information about an Individual





Appendix D: Useful Contact Information

Name of Entity	Telephone	Website
Advice on Drugs	0800 077 6600	www.talktofrank.com
Alcohol Advice	0845 769 7555	www.drinkaware.co.uk
British Association for Counselling and Psychotherapy	0145 588 3300	www.bacp.co.uk
Business Link	0845 600 9006	www.businesslink.gov.uk
CancerLife	0208 373 6222	
Careline	0845 122 8622	www.carelineuk.org
Careers advice	0800 100 900	www.nationalcareersservice.direct.gov.uk
Childline	0800 1111	www.childline.org.uk
Child Support Agency	0845 713 3133	www.csa.gov.uk
Citizens Advice Bureau		www.adviceguide.org.uk
Depression Alliance	0845 123 2320	www.depressionalliance.org
DIAL (Disablement Information Advice Line)	0144 425 0990	www.dialuk.info
Eating Disorders Association Helpline	0845 634 1414	www.b-eat.co.uk/Home
Equality & Human Rights Commission	0845 604 6610	www.equalityhumanrights.com/
Gamblers anonymous	0870 050 8880	http://www.gamblersanonymous.org.uk/
General health and wellbeing		www.teenagehealthfreak.org
Get Connected (Help Resource for under 25s)	0808 808 4994	www.getconnected.org.uk
Gingerbread (Lone Parents)	0800 018 4318	http://www.gingerbread.org.uk/
Health & Safety Executive (HSE)	0845 345 0055	www.hse.gov.uk
SA (Independent Safeguarding Authority)	-	http://www.isa.homeoffice.gov.uk/
LADO (Local Authority Designated Officer)	0208 937 4300	family.frontdoor@brent.gcsx.gov.uk
Lesbian and Gay Foundation	0161 235 8035	www.lgf.org.uk



London Safeguarding Children Board	-	http://www.londonscb.gov.uk/
Mencap (For people with a learning disability & their families)	0808 808 1111	www.mencap.org.uk
MIND (Mental Health)	0845 766 0163	www.mind.org.uk
National Bullying Helpline	0845 225 5787	www.nationalbullyinghelpline.co.uk
National Centre for Domestic Violence	0844 804 4999	www.ncdv.org.uk
National Debt Line	0808 808 4000	http://www.nationaldebtline.co.uk
NHS Direct	0845 4647	www.nhsdirect.nhs.uk
NHS Smoking helpline	0800 169 0169	http://smokefree.nhs.uk
NSPCC Child Protection	0800 800 500	www.nspcc.org.uk
Online safety	-	www.thinkuknow.co.uk
Pregnancy Support (BPAS)	0845 730 4030	www.bpas.org
Rape & Sexual Abuse Support Centre (RASASC)	0808 802 9999	www.rasasc.bizview.co.uk
Relate (help and support with relationships)	0845 130 4010	http://www.relate.org.uk
Samaritans	0845 130 4010	www.samaritans.org
Sexual Health	0845 790 9090	www.whatsinyourpants.co.uk
Shelter line (Homelessness)	0808 800 4444	http://www.shelter.org.uk
Street Pastors	020 777 19770	http://www.streetpastors.co.uk
The Safe Network	0116 234 7217	http://www.safenetwork.org.uk/help_and_advice/Pages/using_social_media.aspx
Victim Support	0845 3030900	www.victimsupport.org.uk
Youth Access (Information, advice & Counselling)	0208 7729900	www.youthaccess.org.uk/contact



Version History

Version	1.0 – 4.2	
Original author(s):	Principal Designated Safeguarding Lead	
Approved by:	Executive Committee	September 2017 January 2018 September 2018
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Version	5.0 – 5.1	
Revised by:	Quality Audit Manager Designated Safeguarding Lead (DSL)	
Revision summary:	<i>General revision of document and procedural approach and contact information; title redacted to 'Safeguarding Policy'; addition of Appendixes and information sharing guidance; prominence of Prevent Duty themes; document formatting applied. Reviewed by Publications Committee / Executive Committee.</i>	
Approved by:	Board of Governors	September 2019
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Version	5.2	
Revised by:	Quality Audit Manager Head of Student Support	
Revision summary:	<i>Updates to content to include mental health concerns within scope of reporting procedures.</i>	
Approved by:	Board of Governors	August 2020
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Revision summary:		
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