



Safeguarding Policy

Version: 6.1. (September 2022)

Category: Policies - Safety, Security and Environment

Owner(s): Executive Committee; Designated Prevent Lead

Approved by: The Board of Governors

Access: **Public** – Anyone can view this document

Scope: This policy applies to all staff (including contractors and volunteers), students and visitors at Fairfield School of Business (FSB)

Quick guide: Reporting a Safeguarding Concern:

To report a safeguarding or health and safety concern or seek guidance, contact a Designated Safeguarding Officer (DSO) at your campus or speak to your campus Dean (see below for contact details for each campus)

If the Campus DSO cannot be contacted, concerns should be directed to the School's Designated Safeguarding Lead (DSL): brikena.muharremi@fairfield.ac

Concerns about the wellbeing of a School employee or contracted worker should additionally be reported to the Human Resources department: hr@fairfield.ac with the DSL in copy.

Where there is an immediate risk of harm or danger to life, the correct procedure is to phone 999 for the emergency services then alert the nearest member of security staff and the Campus Dean.

Note: The below is correct as of September 2022 – Up to date contact information for safeguarding and health and safety staff are posted around campuses

FSB DIGBETH

Campus Dean / Manager	Michael Hill	Michael.hill@fairfield.ac
Health and Safety Nominee	Syed Hassan	Syed.hassan@fairfield.ac
Safeguarding officer (Male)	Michael Hill	Michael.hill@fairfield.ac
Safeguarding officer (Female)	Narjis Tahira	Narjis.tahira@fairfield.ac

FSB CROYDON

Campus Dean / Manager	Dhan Chooramun	dhan.chooramun@fairfield.ac
Health and Safety Nominee	Ali Ahsan	ali.ahsan@fairfield.ac
Safeguarding officer (Male)	Ali Ahsan	ali.ahsan@fairfield.ac
Safeguarding officer (Female)	Shabnam Quazi	shabnam.quazi@fairfield.ac

FSB LUTON

Campus Dean / Manager	Sajid Hussain	Sajid.hussain@fairfield.ac
Health and Safety Nominee	Ulfat Hussain	Ulfat.hussain@fairfield.ac
Safeguarding officer (Male)	Jemmuel Gad	Tel: 01582 325516
Safeguarding officer (Female)	Kristine Bezana	Tel: 01582 325516

Contents

1. Introduction.....	3
Safeguarding Children and Vulnerable Adults.....	3
The Prevent Duty.....	4
2. General Safeguarding Principles.....	4
3. Safeguarding Roles and Responsibilities.....	5
4. Reporting a Concern.....	8
5. Procedural Approach.....	8
6. Records.....	9
7. Training and Support.....	9
8. Safe Recruitment of Staff.....	10
9. Monitoring, Evaluation and Review.....	11
Appendix A: Types of Abuse and Spotting the Signs.....	12
Appendix B: Guidance on Dealing with to a Disclosure of Information.....	16
Appendix C: Guidance on Sharing Information about Individuals At Risk.....	17

1. Introduction

- 1.1. The 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 FSB, 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.
- 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 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 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 contact information on Page 1).

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 of 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, setting out how the institution will seek to comply with the Duty, with specific guidance on how to share information about people who may be at risk of being radicalised or drawn into terrorism.

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 a 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. 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. The DSL's duties are to:
 - Champion awareness of safeguarding issues and changes of policy with the wider staff and student body,
 - Liaise directly with Campus Deans and (where required) 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,

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.

- 3.2. Each campus has both a male and female DSO who report safeguarding concerns to the Designated Safeguarding Lead (DSL) and the Campus Dean. The DSO will provide immediate support and guidance (if required), whilst the DSL and Dean consider the most appropriate response to the safeguarding situation. The Principal will be kept informed.
- 3.3. 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), without 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 to the Designated Safeguarding Lead (DSL) – contact information is on page 1.
- 3.4. The Principal 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.
- 3.5. 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 that:
- 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.
- 3.6. 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,
- ensuring that when an employee or contractor leaves the business, the badge is 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,
- Making 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 or student should be suspended pending the 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 a 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 1)

- 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) and/or their Dean at the earliest opportunity. If a DSO is unavailable or a disclosure concerns them, the disclosure should be directed to the Dean and the Designated Safeguarding Lead.
- 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 individual's 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. An information sharing procedure is included in Appendix C.

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 Dean and the Designated Safeguarding Lead (DSL). Where the issue affects a member of staff, a senior HR officer will be involved. The Principal will be kept informed of all cases.

- 5.2. The Campus Dean and 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. Other stakeholders may be involved at this stage, where specific knowledge or insights are required.
- 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 where it becomes aware of a potential breach of conduct. 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 other relevant authorities or professional bodies.

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 DSL. 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 record 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 of 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 Safeguarding and Prevent Duty. This training will involve an assessed component for which staff must demonstrate satisfactory understanding of Safeguarding and Prevent themes.
- 7.4. All staff are required to undertake refresher Safeguarding and Prevent training every 2 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 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 Service's 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 DSL 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 learnt' 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 restraining, 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 abuse may exhibit some of the indicators associated with physical or psychological abuse. Additionally, they may:

- not want to be touched or be 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 licence 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 DSO 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-wing or left-wing ideology and 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 to 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 from its procedures for responding to other suspected safeguarding risks.

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 DSO) in a way that is appropriate to their age and emotional state.	Promise confidentiality
Report to your line manager and/or DSO	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 DSO)	

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 carers¹

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.

When 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 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/1062969/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 about 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 by the sharing of information.
5. Ensure that any sharing of information is necessary, proportionate, relevant, adequate, accurate, timely and secure.: The School will ensure that any information sharing is necessary for the purpose for which it is shared,, any information is only shared with those individuals who need to have it, that any shared information is accurate and up-to-date and shared securely and in a timely fashion.
6. Keep a record of decisions made and the reasons for them – whether the decision is to share information or not. The School will 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 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:**

Information that is relevant to the purposes for which it is shared should only 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 so that it can be understood and relied upon.

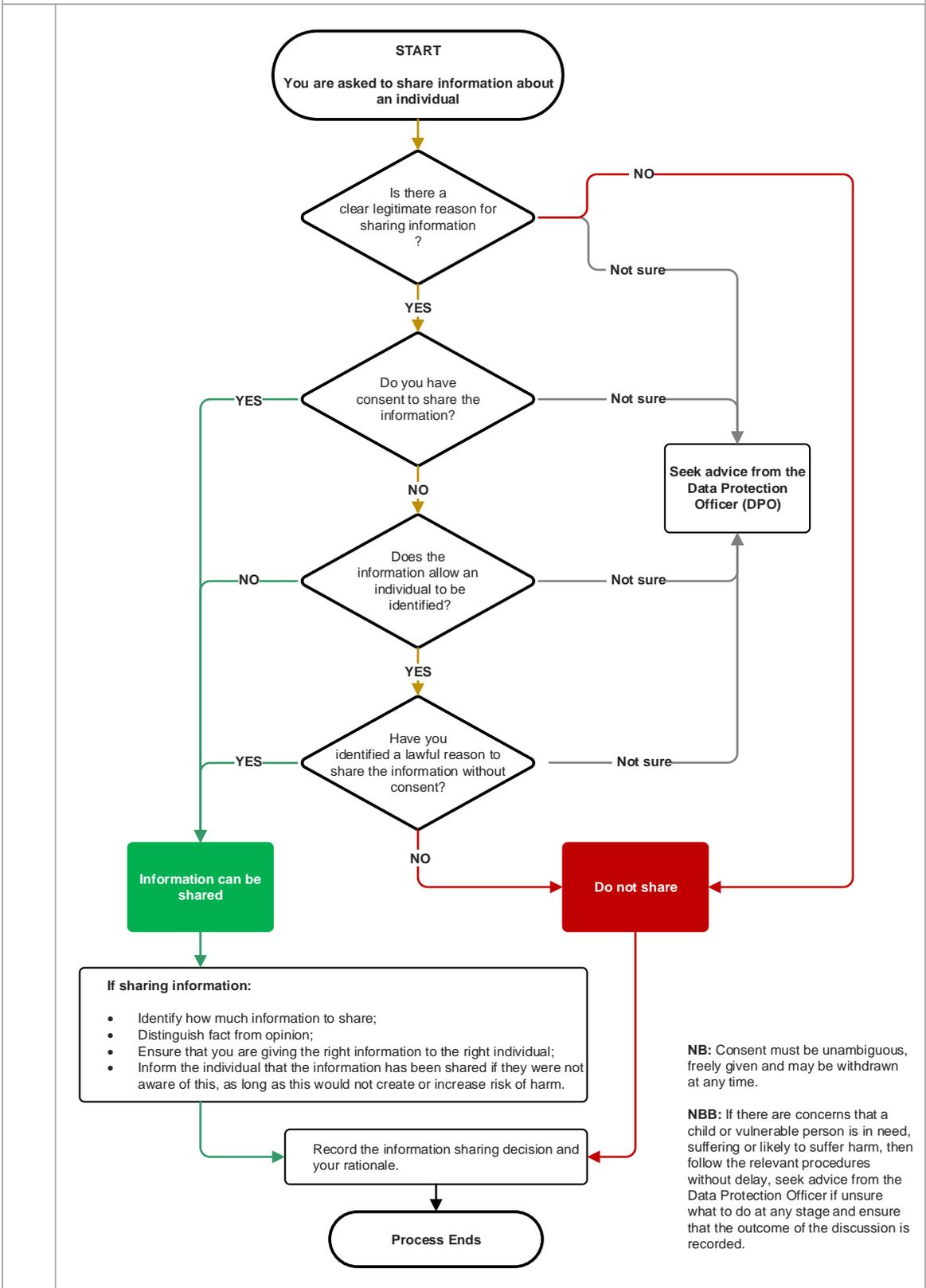
✓ **Accurate**

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 aspects of the above, staff should contact the School's DSL (See page 1)





Version Tracking:

Version	Author / revisions by	Changes summary	Approved by	Date
1.0 – 4.2	Principal Designated Safeguarding Lead	Original version for submission to the Board of Governors	Executive Committee	Sep 2017 Jan 2018 Sep 2018
5.0 – 5.1	Quality Audit Manager Designated Safeguarding Lead (DSL)	General revision of document and procedural approach and contact information; title redacted to 'Safeguarding Policy'; addition Prevent Duty themes.	Board of Governors	Sep 2019
5.2	Quality Audit Manager Head of Student Support	Updates to content to include mental health concerns within scope of reporting procedures	Board of Governors	Aug 2020
6.0	Quality Officer Head of Student Support	Annual review and update, DSL contact information updated	Board of Governors	Jan 2022
6.1	Designated Safeguarding Lead (DSL) Quality Unit	Minor corrections and clarifications throughout; additional information on mental health concerns; contact information updated; new formatting applied	Board of Governors	Sep 2022

Date of next review: September 2023