



Safeguarding Children and Vulnerable Adults Policy

Policy agreed (date):	1 st September 2023
Policy published (including on website) (date):	1 st September 2023
Next review (date):	September 2024

Table of Contents

Content	Page
Key Contacts	3
Statement of Policy	4
Definitions	5
Roles and Responsibilities	7
Monitoring and Evaluation	8
Appendix 1 - Responding to concerns	9
Appendix 2 – Safeguarding Practice	10
Appendix 3 - DSL Responsibilities	11
Appendix 4 - Supporting Learners	12
Appendix 5 - SEND Learners	14
Appendix 7 - Information Sharing	16
Appendix 8 – Safe Recruitment and Safeguarding Training	17
Appendix 9 - Allegations against staff, whistleblowing	20
Appendix 10 - Physical Intervention	22
Appendix 11 - Risks to Learners	23

Appendix 12 - On-Line Safety	27
Appendix 13 - Glossary of terms	28
Appendix 14 - Wigan Council, DBS and visitors	33
Appendix 15 - Bridgewater NHS, DBS	34

Key Contacts

Table of identified persons with specific lead responsibilities in relation to Safeguarding and other key agencies.

Key Safeguarding Personnel			
Role	Name	Telephone	Email
Centre manager Deputy Designated Safeguarding Lead	Daniel Bowman	01257 251502	daniel@firtreecic.co.uk
Designated Safeguarding Lead (DSL)	Suzanne Fletcher	01257 251502	suzanne@firtreecic.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Darren Fletcher	01257 251502	darren@firtreecic.co.uk
Nominated Governor	Martin Taylor	01257 251502	martin@firtreecic.co.uk
Chair of Governors	Darren Fletcher	01257 251502	darren@firtreecic.co.uk
Designated Teacher for Looked After Children	Daniel Bowman	01257 251502	daniel@firtreecic.co.uk
Governor with Safeguarding Responsibility	Gill Sommers	07879 844769	info@thesafeguardingconsultant.co.uk
The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education (2023)			
Agency Contact Details			
Local Authority Designated Officer	Diane Kitcher	01942 486042	lado@wigan.gov.uk

Children's Social Care referrals	Duty Team	01942 828300	https://www.wigan.gov.uk/Resident/Health-Social-Care/Children-and-young-people/ProfessionalReferralForm.aspx
Early Help Hub Wigan		01942 486262	EHH@wigan.gov.uk
Wigan Safeguarding Children's Board		01942 828300	wscb@wigan.gov.uk

If you believe a child or young person is **at immediate risk** of significant harm or injury, contact the **Police on 999**

1. Statement of Policy

1.1 Introduction

In response to legislation and statutory guidance and in line with the Local Authority's Safeguarding Board, Fir Tree CIC takes seriously its duty to safeguard and promote the welfare of all learners. Safeguarding is everybody's responsibility and as such this policy applies to all staff, governors and volunteers working for the college.

Fir Tree CIC recognise that an allegation, disclosure or suspicion of abuse, or an expression of concern about a learner, could be made to any member of staff, not just those with a teaching or welfare-related role. Similarly, any member of staff may observe or suspect an incident of abuse or express concern regarding the welfare of a learner. It will therefore ensure that all staff are trained and prepared.

1.2 Principles of Safeguarding at Fir Tree CIC

Fir Tree CIC will take all reasonable measures to ensure that any risk of harm to learners' health is minimised and will take all possible action to address concerns about the welfare of any learner or learners, in full partnership with other local agencies.

Fir Tree CIC will endeavour to create a safe environment where learners feel secure, confident and independent and are encouraged to talk and are listened to.

It will do this by:

- Ensuring that all staff are familiar with this policy, and that they are trained in safeguarding and Prevent and understand their responsibilities to spot signs of abuse and report concerns.
- Empowering staff, through training, to feel confident when dealing with and reporting concerns or when dealing with a disclosure.
- Positively embracing topics such as learner health and safety, criminal exploitation, bullying and British Values.
- Ensuring that 'enhancement' lessons include information on learner welfare issues such as sexual health, drugs and substance misuse.
- Understanding the Local Authorities 'Early Help Framework' and how early intervention can support the social needs of learners.
- Ensuring that all staff have read and understood Part 1 of 'Keeping Children Safe in Education'
- Providing a pastoral support system for learners that offers help as needed.
- Ensuring that the learning environment is safe and assessed for risk.

1.3 Legislative Frameworks and Guidance

This policy is based upon the following legislation and statutory guidance:

- ☐ Keeping Children Safe in Education 2023 (DFE)
- ☐ Working Together to Safeguard Children 2023
- ☐ Multi-agency statutory guidance on FGM April 2016
- ☐ Wigan Safeguarding Children Board's Policy
- ☐ Wigan Safeguarding Adults Board
- ☐ Counter Terrorism and Security Act 2015.
- ☐ Prevent Duty Guidance July 2015
- ☐ Serious Crime Act 2015
- ☐ Care Act 2014
- ☐ Children Act 2004
- ☐ Section 175 Education Act 2002
- ☐ NSPCC - When to call the Police 2020

1.4 Related Policies

This policy should be read in conjunction with the following policies

- ☐ Prevent Policy, Risk Assessment and Action Plan
- ☐ Equality and Diversity Policy
- ☐ Whistle Blowing Policy
- ☐ Behaviour for Success Policy
- ☐ Staff Conduct Policy
- ☐ Substance Misuse Policy
- ☐ Data Protection Policy
- ☐ Staff Recruitment Policy
- ☐ Health and Safety Policy
- ☐ Learner Leaving Site/Missing Policy
- ☐ E-safety Policy

1.5 Scope

This policy applies to everyone who is employed or engaged by Fir Tree CIC, whether in paid employment or not. It also applies to all visitors and contractors.

2. Definitions

2.1 Definitions of Abuse

The following are recognised as definitions of abuse, although any act which harms a child, young person or vulnerable adult should also be considered:

Physical Abuse - may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent an injury occurring

Neglect - the persistent or severe failure to meet a child's, young person's or vulnerable adult's physical and/or psychological needs, which may result in serious impairment of their health or development

Sexual Abuse involves a child, young person or vulnerable adult being forced or coerced into participating in or watching sexual activity of any kind. Any apparent consent or awareness is irrelevant

Emotional Abuse – persistent emotional ill treatment or rejection; includes abusive or offensive electronic communications. This causes severe and adverse effects on behaviour and emotional development, resulting in low self-esteem. Some degree of emotional abuse is present in all forms of abuse.

Financial Abuse - in intimate or parental relationships is a way of controlling a person's ability to acquire, use, and maintain their own money and financial resources

(Further information on risks to children and young people is detailed in Appendix 11)

2.2 Other Definitions

Safeguarding – protecting children, young people and vulnerable adults from maltreatment, preventing impairment of their physical or mental health or development and ensuring they are growing up in circumstances consistent with the provision of safe and effective care

Child Protection – any activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm

Significant Harm – The Children's Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children. Some children may be in need of help because they are suffering or likely to suffer significant harm

Extremism and Radicalisation – Extremism is defined as 'vocal or active opposition' to British values; democracy, the rule of law, individual liberty and mutual respect for and tolerance of those with different faiths and beliefs and for those without faith. Radicalisation is defined as 'the way in which a person comes to support terrorism and encourages other people to believe in views that support terrorism' The Prevent Duty 2015 places a responsibility on specified authorities to

prevent children and young people from becoming radicalised and as such is a key part of the safeguarding responsibilities of the organisation.

Child/Young Person – anyone under the age of 18

Vulnerable Adult – is a person who is aged 18 or over and who is, or may be, in need of community services due to age, illness or a mental or physical disability, and who is, or may be, unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.

Regulated Activity - Those working in specified activities will be classed as engaging in regulated activity. Put simply, this is anyone who is teaching, training, instructing, coaching, caring for or supervising children or providing personal care, healthcare, social work, assistance with household matters and personal affairs, and transportation to vulnerable adults.

3. Roles and Responsibilities

Safeguarding is everyone's responsibility and all staff involved in Fir Tree CIC activities have a role to play. Fir Tree CIC will ensure that staff undergo safeguarding training at induction, advanced training (as appropriate) and will take part in regular development sessions where safeguarding updates/refreshers will be programmed.

3.1 Designated Safeguarding Lead (DSL)

Fir Tree CIC have appointed a Designated Safeguarding Lead (DSL) to act as the single point of contact in all safeguarding matters. Deputy Designated Safeguarding Leads have also been appointed and trained. (See Appendix 3 for full list of responsibilities)

The DSL is: **Suzanne Fletcher**

The DDSLs are: **Darren Fletcher** and **Daniel Bowman**

The DSL and deputies will be responsible for;

- liaising with other DSLs in health and education settings,
- understanding the work of the Safeguarding Partners and ensuring that they liaise with them as required.
- managing, when required to do so, the referral of cases of suspected abuse or allegations to the relevant agencies,
- providing advice and support to staff who have made referrals to other agencies,
- keeping detailed, accurate, secure written records of concerns and referrals,

- referring cases to the Channel programme via the MASH team where there is a radicalisation concern,
- maintaining secure and accurate records of any child protection concern, referral, complaint or allegation,
- ensuring a safe learning environment including the filtering and monitoring of Fir Tree IT systems and platforms.
- attending case conferences and review meetings as appropriate,
- communication of the policy and arrangements to all relevant parties including but not limited to children, young people and vulnerable adults, their parents and families, staff,
- engaging with local authorities and other agencies as appropriate,
- ensuring that staff receive safeguarding training appropriate to their roles and update this annually,
- maintaining accurate and up to date employment records of all staff including DBS checks,
- maintaining safeguarding training records,
- providing periodic reports to the board about safeguarding incidents or referrals as well as policy implementation,
- act as a source of support, advice and expertise for staff

3.2 Staff Responsibilities

All staff are required to read and understand Part 1 and the Further Information Annex of the DfEs 'Keeping Children Safe in Education' guidance and ensure that they have read and understood this policy.

Staff have a responsibility to report safeguarding concerns. If any member of staff is concerned about the welfare or safety of a child, young person or vulnerable adult, they must report their concerns to the DSL, as soon as practicably possible. (See Appendix 1 for full process)

Staff will receive training on how to deal with disclosures made by a child, young person or vulnerable adult.

4. Monitoring and Evaluation

The implementation of the Safeguarding Children and Vulnerable Adults Policy and procedures will be monitored by:

- Governing Body visits to the education setting
- SLT drop ins and discussions with learners and staff
- Learner surveys and questionnaires
- Scrutiny of attendance data
- Scrutiny of Governor Meeting minutes
- Logs of bullying / racist / behaviour incidents for SLT and GB to monitor
- Review of parental concerns and parent / carer questionnaires

Appendix 1

Responding to concerns / disclosures of abuse

Staff should adhere to the following Dos and Don'ts when concerned about abuse or when responding to a disclosure of abuse.

Do:

- **Create a safe environment by offering** the learner a private and safe place if possible.
- **Stay calm** and reassure the learner and stress that he/she is not to blame.
- **Tell** the learner that you know how difficult it must have been to confide in you.
- **Listen carefully** and **tell** the learner what you are going to do next.
- Use the **'tell me', 'explain', 'describe'** and/or mirroring strategy.
- **Tell only the Designated or Deputy Safeguarding Lead.**
- **Record** in detail using CPOMS without delay, using the learner's own words where possible.

Don't:

- Take photographs of any injuries.
- Postpone or delay the opportunity for the learner to talk.
- Take notes while the learner is speaking or ask the learner to write an account.
- Try to investigate the allegation yourself.
- Promise confidentiality, e.g. Say you will keep 'the secret'.
- Approach or inform the alleged abuser.

All staff should record any concern about or disclosure by a learner of abuse or neglect and report this to the D/DSL using CPOMS. It is the responsibility of all staff at Fir Tree CIC to ensure that the D/DSL receives the record of concern without delay.

In some circumstances, the D/DSL or member of staff may seek advice by ringing Children's / Adults Social Care.

During term time, the DSL and / or a DDSL will be available during Fir Tree CIC hours for staff to discuss any safeguarding concerns.

Safeguarding Practice

Fir Tree CIC will ensure that:

- There is a safeguarding policy in place together with a staff code of conduct which are reviewed and updated annually.
- The college operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training (which will be renewed every 3 years).
- Procedures are in place for dealing with allegations of abuse against staff and volunteers and a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have, had they not resigned.
- Low level concerns about staff behaviour are recorded and the appropriate guidance and retraining provided.
- A senior leader has Designated Safeguarding Lead (DSL) responsibility who has; along with the Deputy Designated Safeguarding Leads, undertaken the relevant training.
- The LADO is consulted on all matters involving allegations against members of staff.
- All other staff have complete safeguarding training as appropriate
- The Safeguarding Children and Vulnerable Adults and Child Protection policy is available on Fir Tree CIC website or by other means.
- The name of the designated members of staff for safeguarding (DSL's and DDSL's) will be clearly visible in college.
- All members of staff are trained in e-safety and reporting concerns
- All new members of staff will be given a copy of our safeguarding statement and Safeguarding Children and Vulnerable Adults and Child Protection Policy, with the DSL's names clearly displayed, as part of their induction.
- All staff, volunteers and governors have safeguarding training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of the colleges Safeguarding Children and Vulnerable Adults and Child Protection Policy.
The Policy is available publicly on the college website.
- All visitors complete a sign in / out form and wear a visitor ID badge. Visitors of a professional role are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at the education setting. (Supporting letters in

relation to DBS checks of visitors holding professional ID badges can be found in Appendix 15)

- The SLT consider how learners may be taught about safeguarding.
- Specific topics will include:
 - Online Safety
 - Drug and alcohol education
 - Bullying
 - Physical health
 - Gangs

DSL Responsibilities

The Designated Safeguarding Lead (DSL) should take lead responsibility for safeguarding and child protection and is responsible for:

1. Referring a learner if there are any concerns about possible abuse to the Local Authority and acting as a focal point for staff to discuss these concerns. Referrals should be made by calling the Children's or Adults duty social care team.
2. Keeping written records of concerns about a learner even if there is no need to make an immediate referral.
3. Ensuring that all such records are kept confidentially, securely stored and are separate from learner records, are transferred securely and held until their 25th birthday. In the instance of an early help intervention, consideration will be given to the welfare of the learner and consultation with the family for appropriate transfer of information. Children looked after records are retained for 99 years, and a record is kept and witnessed of the disposal of individual's record.
4. Making sure when a learner joins, the previous school or college are contacted to request the transfer of any child protection files and when a learner leaves, any information regarding safeguarding (current or historic) as well as the child protection file, where applicable, is transferred to the new education setting as soon as possible. This should be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained.

Ensuring a safe physical environment for all learners including online learning and activity.

5. Ensuring that they, or the staff member attending case conferences, core groups, early help meetings or other multi-agency planning meetings, contribute to assessments and provide a report which has been shared with the parents where appropriate. Ensuring that any learner currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
6. Organising safeguarding training annually for all staff.
7. Providing an annual report for the governing body and Fir Tree CIC Directors, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and a number of children on the child protection register (anonymised)
8. Liaising with the Safeguarding Partners, other agencies and professionals

Supporting Children and Young People

The voice of the learner is central to our safeguarding practice and learners are encouraged to express their views in all matters affecting them.

Fir Tree CIC will;

- Work to establish and maintain an ethos where learners feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with learners e.g. through safety questionnaires
- Ensure that all learners know there is a trusted adult at Fir Tree CIC whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum

We are also committed to work in partnership with parents and carers. For learners under the age of 18, in most situations, we will discuss initial concerns with them. However, the D/DSL will not share information where there are concerns that if so doing would:

- place a learner at increased risk of significant harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a learner.

Fir Tree CIC will consider the need for an Early Help assessment when it is identified that there are low level concerns or emerging needs. It is the responsibility of the college to initiate Early Help to identify what the family's strengths and needs are. This will inform whether the college can support the family or whether a referral to another agency is needed. This process provides a way of recording support and interventions that have been provided by Fir Tree CIC to the learner and also supports a referral for additional support that may be needed from more targeted services where a single agency has been unable to meet that need

If at any point during the Early Help process, the risk increases and the college becomes concerned that the learner is, or is likely to suffer significant harm, then a referral will be made to children's/adult's social care.

When we become aware that a learner is being privately fostered, we remind the carer/parent of their legal duty to notify Wigan Children's Social Care. We follow this up by contacting Children's Social Care directly.

Fir Tree CIC will support all learners by:

- Encouraging self-esteem and self-assertiveness through the curriculum, as well as our relationships, whilst not condoning aggression or bullying.
- Healthy relationships
- Promoting a caring, safe and positive environment.

- Liaising and working together with all other support services and those agencies involved in the safeguarding of children and vulnerable adults.
- Notifying Social Care as soon as there is a significant concern.
- Providing continuing support to a learner about whom there have been concerns, who leaves Fir Tree CIC by ensuring that appropriate information is copied under confidential cover to the learner's new setting and ensuring Fir Tree CIC records are forwarded as a matter of priority.

If at any point staff at Fir Tree CIC become concerned that a learner is at serious risk of harm they should respond appropriately. If Fir Tree CIC is concerned that a child is at **immediate** or **imminent** risk then they should contact Greater Manchester Police on either 111 or 999. If however Fir Tree CIC is concerned that a learner is, or is likely to suffer serious harm but it is not imminent they should call Wigan Children's Social Care Referral Team on 01942 828300 or Wigan Adults Social Care Referral Team on 01942 828777.

Children with Special Educational Needs and Disabilities (SEND)

Fir Tree CIC will use the same considerations for children and young people with SEND, as detailed above. However, Fir Tree CIC takes into consideration that additional barriers can exist when recognising abuse and neglect in this group of learners. These can include:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learners SEN or disability without further exploration;

A higher risk of vulnerability due to factors such as; a learning disability, lack of awareness, social isolation, which may contribute to risks such as online vulnerability;

Being more prone to peer group isolation than other learners;

The potential for learners with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and

Communication barriers and difficulties in overcoming these barriers.

Fir Tree CIC recognises and takes into account that learners with SEN and disabilities can face a number of challenges to disclosure, including; prejudice negative responses and low expectations.

Fir Tree CIC will complete individual learner risk assessments for all learners. The individual learner risk assessment will be completed by a member of the Senior Leadership and Management Team in collaboration with the learner and their parents/carers as part of the interview and application process.

The risk assessment will be made available to the wider teaching and delivery team at Fir Tree CIC but will not be shared with external parties or individuals.

The risk assessment will be reviewed on a termly basis unless there is a need for more frequent review and re-assessment.

Information Sharing

Fir Tree CIC recognise that all matters relating to safeguarding concerns and child protection are confidential

The Government has issued Information Sharing for Safeguarding Practitioners Guidance that included 7 'Golden Rules' of Information Sharing in safeguarding :

The Government guidance (described by the NSPCC, 2018) is:

1. **Remember that the UK General Data Protection Regulations (GDPR) Data Protection Act 2018 and Human Rights law are not barriers** to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. **Be open and honest with the individual** (and/or their family where to do so.
3. **Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. **Share with informed consent where appropriate** and, where possible, respect they may be at risk.
5. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion and is shared securely
7. **Keep a record of your decision and the reasons for it** – whether it is to share or not

All staff at Fir Tree CIC are aware that they have a professional responsibility to share information in order to safeguard learners and cannot assume that someone else will pass on the information.

Sharing of information will be necessary for the purpose for which it's being shared, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely

Fir Tree CIC will always undertake to share our intention to refer a learner to Social Care with their parent's / carers unless to do so could put the learner at greater risk of harm or impede a criminal investigation.

Safer Recruitment and Safeguarding Training

Fir Tree CIC understands its legal responsibilities to ensure that all those recruited to work with learners are safe to do so. We will therefore follow the Safer Recruitment Guidelines as set out in KCSIE 2023 (Part Three)

New staff

When appointing new staff, we will:

1. Verify their identity
2. Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).
3. Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
4. Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
5. Verify their professional qualifications, as appropriate
6. Ensure they are not subject to a prohibition order if they are employed to be a teacher
7. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
8. Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
9. Request written information about previous employment history and check that information is not contradictory or incomplete.
10. Seek references on all short-listed candidates, including internal candidates, before interview asking specific questions about the suitability of the applicant to work with children and carry out online searches to further assess the candidates suitability to work with children and vulnerable adults.
11. Verify their mental and physical fitness to carry out their work responsibilities

(Regulated activity means a person who will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not)

Existing staff

If concerns are raised about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm)
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

All trustees, local governors and members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

In addition, their identity and right to work in the UK will be required before appointment.

Staff Induction

The welfare of all our learners is of paramount importance. All staff including volunteers are informed of our safeguarding procedures including online safety, at induction. Our induction also includes:

- Explanation of the conduct expected of staff within the college – all members of staff and volunteers at Fir Tree CIC will be expected to have read, signed and understood the colleges Staff Code of Conduct.
- Opportunities for a new member of staff to discuss any issues or concerns about their role or responsibilities
- Confirmation of the line management process whereby any general concerns or issues about the person's ability or suitability will be addressed.

Safeguarding Training

This training is for all staff and is updated annually to ensure staff understand their role in safeguarding. In addition, all staff members receive safeguarding and child protection updates (for example, via email, weekly briefings, staff meetings) as necessary. All staff also receive training in online safety, and this is updated as necessary.

Advanced Safeguarding Training

The D/DSL have had additional training which is updated every two years as a minimum. Their knowledge and skills are refreshed at least annually e.g. via e-bulletins or safeguarding networking events with other D/DSLs.

Safer Recruitment Training

At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every 3 years as a minimum.

Preventing Radicalisation

All staff, volunteers and governors undertake Prevent training.

Governors

Governors undertake Level 1 online Safeguarding Training. In addition, governors may choose to attend the college internal safeguarding and child protection training.

Allegations Against Staff

The primary concern in the event of an allegation against a member of staff is to ensure the safety of the young person or vulnerable adult. In all cases, action will be taken quickly, confidentially and professionally, with all parties clear that suspension is not an indicator of guilt, but a required part of a process. Where an allegation has been made where the member of staff has;

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

the Centre Manager must contact the Local Authority Designated Officer for further advice. Where it is clear that a criminal offence may have occurred, the matter must be reported to the police. Any subsequent dismissal must be reported to the Disclosure and Barring Service.

Where an allegation is made, the Centre Manager will meet with senior managers to discuss the action that Fir Tree CIC must follow. In order that a full and fair investigation can be carried out, consideration must be given to suspending the member of staff.

If the allegation or complaint relates to behaviour that does not meet the Harms Threshold, the matter will be recorded as a low-level concern and the member of staff may be subject to disciplinary action

In the event that a member of staff suspects any other member of staff of abusing a child, young person or vulnerable adult, it is their responsibility to report these concerns to the Centre Manager, except when they are the person against whom the allegation is being made. In this instance, the report should go to the Chair of Governors.

Whistleblowing

All staff can raise concerns about poor or unsafe practice and potential failures in the colleges safeguarding regime. Our whistleblowing procedures are in place for such concerns to be raised with the Centre Manager.

If a staff member feels unable to raise an issue with the Centre manager or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- The NSPCC whistleblowing helpline - Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email help@nspcc.org.uk.
- A member of the governing body: Martin Taylor (Safeguarding Governor)

We recognise that learners cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitudes or actions of colleagues.

Whistleblowing regarding the Centre Manager should be made to the Directors.

It is acknowledged that Whistleblowers have the right to remain anonymous, however identifying yourself may assist with any further investigations.

Disagreements, Escalation and Resolution

Effective working together depends on an open approach and honest relationships between colleagues and between agencies.

Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for re-consideration if they believe a decision to act / not act in response to a concern raised about a learner is wrong. In such cases the WSCB Case Resolution Protocol (formerly escalation policy) is used if necessary.¹⁰ If we are on the receiving end of a professional challenge, we see this as an opportunity to reflect on our decision making.

¹⁰ <http://www.wiganlscb.com/Docs/PDF/Professional/Resolution-Policy.pdf>

Physical Intervention and Use of Reasonable Force

We acknowledge that staff must only ever use physical intervention as a last resort, when a learner is endangering him / herself or others.

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain learners. "Reasonable" in these circumstances means using no more force than necessary.

Such events should be recorded in the bound and numbered book which is stored securely in the conference room.

Staff who are likely to need to use physical intervention or reasonable force will be appropriately trained in an accredited positive handling technique.

We understand that physical intervention of a nature which causes injury or distress to a learner may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with learners, and all staff are aware of the safer working practice guidance to ensure they are clear about their professional boundary.

Immediately following any such incident, the member of staff concerned should tell the Centre Manager or Directors in his absence, and then provide a written factual report as soon as possible afterwards using the physical intervention incident bound and numbered book. It should include the following information:

The name(s) of the learner(s) involved, when and where the incident took place;

The names of any other staff or learners who witnessed the incident;

The reason that force was necessary (e.g. to prevent injury to the learner, another learner or a member of staff);

Briefly, how the incident began and progressed, including details of the learner's behaviour, what was said by each of the parties, the steps taken to defuse or calm the situation, the degree of force used, how that was applied, and for how long;

The learner's response, and the outcome of the incident;

Details of any obvious or apparent injury suffered by the learner, or any other person, and of any damage to property.

Types of Abuse and Risks to Learners

Sexual Violence and Sexual Harassment

Fir Tree CIC recognises that allegations of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made.

Decisions will be made on a case by case basis with the DSL taking a leading role, supported by other agencies such as Social Care and the Police as required.

Peer on Peer Abuse

All learners have a right to attend college and learn in a safe environment. All peer-on-peer (now referred to as child-on-child) abuse is unacceptable and will be taken seriously. Staff recognise that while both boys and girls can abuse their peers, it is more likely that girls will be victims and boys' perpetrators of such abuse. Peer on peer abuse is not tolerated, passed off as "banter" or seen as "part of growing up". It is likely to include, but not limited to:

- bullying (including cyber bullying)
- gender based violence / sexual assaults
- sexting or
- Initiation / hazing type violence and rituals.

Consequently, peer on peer abuse is dealt with as a safeguarding concern, recorded as such and not managed through the systems set out in Fir Tree CIC behaviour policy.

Victims, perpetrators and any other learner affected by peer-on-peer abuse will be supported through Fir Tree CIC's pastoral system and the support will be regularly reviewed. We minimise the risk of peer-on-peer abuse by providing:

- A relevant curriculum, that helps learners to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe.
- Established systems for learners to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously.

The DSL liaises with other professionals to develop robust risk assessments and appropriate specialist targeted work for learners that are identified as posing a potential risk to other learners.

Bullying

Our policy on anti-bullying is set out in a separate document. All staff are aware that learners with SEND and / or differences / perceived differences are more susceptible to being bullied / victims of abuse.

We keep a record of known bullying incidents.

Radicalisation

Protecting learners from the risk of radicalisation is part of Fir Tree CIC's' wider safeguarding duties. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. As with managing other safeguarding risks, our college will be alert to changes in learner's behaviour that could indicate that they are in need of protection. Staff should use their professional judgement in identifying learners who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Child Sexual Exploitation

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership

- injuries from physical assault, physical restraint, sexual assault.

Criminal Exploitation / County Lines

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of Criminal Exploitation / County Lines

- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them
- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewellery
- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language you wouldn't expect them to know
- Coming home with injuries or looking particularly dishevelled
- Having hotel cards or keys to unknown places.

Human Trafficking, Modern Day Slavery

Fir Tree CIC will ensure that the Designated Safeguarding Lead and other key staff are trained in spotting the possible signs of human trafficking and modern-day slavery.

Female Genital Mutilation

The Female Genital Mutilation Act 2003 was amended by the Serious Crime Act 2015 where the law was extended to:

- A non-UK national who is 'habitually resident' in the UK and commits such an offence abroad can now face a maximum penalty of 14 years imprisonment. It is also an offence to assist a non-UK resident to carry out FGM overseas on a girl who is habitually, rather than pertinently, resident in the UK. This follows a number of cases where victims were unable to get justice as FGM was committed by those not permanently residing in the UK.
- A new offence is created of failing to protect a girl from the risk of FGM. Anyone convicted can face imprisonment for up to seven years and / or and unlimited fine.
- Anonymity for the victims of FGM. Anyone identifying a victim can be subject to an unlimited fine.

Fir Tree CIC recognises and adheres to its mandatory duty to report any suspected or known cases of FGM about a female under 18 years old to the police.

Forced Marriage

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a college or through a third party. The Forced Marriage Unit offers support to victims and should be contacted for advice and support.

Young Carers

A young carer is someone under 18 who helps look after someone in their family, or a friend, who is ill, disabled or misuses drugs or alcohol. Fir Tree CIC recognises the impact that being a Young Carer can have on learners, and the importance of identifying those learners so that appropriate support can be provided.

Wigan Safeguarding Children Board coordinates our local Young Carers Strategy.

Where a learner at Fir Tree CIC is identified as having additional support needs due to being a young carer, or where a multi-agency approach may be required, Fir Tree CIC uses the Early Help Framework and routes into the StartWell Service.

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe learners 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 learners have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken, following the safeguarding policy and speaking to the designated safeguarding lead or a deputy.

Appendix 12

Online safety

Fir Tree CIC recognises the benefits and opportunities which new technologies offer to teaching and learning. Our approach is to implement safeguards within the centre, and to support staff and learners to identify and manage risks. This is achieved through a combination of security measures, training and guidance and implementation of associated policies.

The e-safety policy applies to all persons who have access to Fir Tree CIC IT systems, both on premises and remote access. Any user of Fir Tree CIC IT systems must adhere to e-safety rules and the acceptable use of IT policy.

There are clear lines of responsibility for e-safety within Fir Tree CIC. The first point of contact should be the Centre Manager. All staff are responsible for ensuring the safety of learners and should report any concerns immediately to the Centre Manager.

The Centre Manager and Directors will be responsible for ensuring that the Fir Tree CIC infrastructure and network is as safe and secure as is reasonably possible.

Fir Tree CIC outsource technical support with reference to the technical infrastructure, equipment, filtering and monitoring of electronic devices within the centre, but understand its responsibility to raise awareness amongst staff and board members of the systems that are in place

Learners will be taught how to stay safe online and 'safer use of internet' as part of their enhancement classes.

The Staff Code of Conduct will provide guidance on how to conduct safe on-line lessons.

All staff will undertake online safety training.

Appendix 13

Glossary

A Child	A person who has not yet reached their 18 th birthday.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
Bullying & Cyberbullying	Behaviour that is: <ul style="list-style-type: none">• repeated• intended to hurt someone either physically or emotionally• often aimed at certain groups, for example because of race, religion, gender or sexual orientation
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Child sexual exploitation (CSE)	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Children with Special Educational Needs and/or disabilities	SEN - a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability - a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
County Lines	Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
Criminal Exploitation	Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.
Domestic Abuse	any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: <ul style="list-style-type: none"> • psychological • physical • sexual • financial • emotional
Early Help	Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person's life.

Emotional Abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.</p> <p>It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p>
Female Genital Mutilation (FGM)	<p>Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there’s no medical reason for this to be done.</p>
Gangs & Youth Violence	<p>Defining a gang is difficult. They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang.</p> <p>A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves</p>

	<p>(and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.</p> <p>An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).</p>
Hate	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> • disability • race • religion • transgender identity • sexual orientation.

Honour-based violence	Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
Neglect	<p>Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> • Protect a child from physical and emotional harm or danger. • Ensure adequate supervision (including the use of inadequate care-givers). • Ensure access to appropriate medical care or treatment. • It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
Peer on Peer Abuse	Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18.
Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)
Radicalisation & Extremism	Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
	Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	<ul style="list-style-type: none"> • protecting children from maltreatment; • preventing impairment of children’s health or development; • ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and • taking action to enable all children to have the best outcomes.
Sexting now known as youth produced sexual imagery	<p>Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.</p> <p>They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.</p>
Sexual Abuse	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children</p>
Trafficking	<p>Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.</p>

Appendix 14

To : All Schools and Academies

Our reference: HRESC
Your reference:
Please ask for: HR Employment
Service Centre
Extension: 2333
Direct line: 01942 827333
Date: 8th May 2017

Dear Colleague

DBS Checks for School Visitors

I have been asked to confirm the situation regarding schools asking visitors to provide copies of their DBS certificate or DBS number. It is unlikely that visitors will carry their certificate with them and in many cases, it will not be necessary for them to do so.

I can confirm that any visitor who is employed by Wigan Council will have had their post assessed for eligibility for a DBS Check, including an assessment of the work they do in schools. They would not have been employed without an acceptable clearance being received. Therefore, if your visitor is a current Wigan Council employee, you can be assured that they have received satisfactory clearance and you do not need to see it. You should of course check their Wigan Council badge to confirm their identity.

Further guidance on DBS checks for other visitors to school will follow.

I hope you find this advice useful. If you have any questions or wish to clarify any areas, please contact me. As lead counter signatory, I am available to provide advice on any DBS issue you may have.

Yours sincerely

Claire O'Sullivan
Lead Counter Signatory

Appendix 15

Wigan Borough Head
Teachers 9th February 2017

Dear Head Teacher

RE: DBS Checks

Bridgewater Community Healthcare NHS Foundation Trust operates a Disclosure and Barring Service (DBS) Policy based on the requirements of the Police Act 1997 and the mandatory pre-employment checking procedure requirements of the Department of Health. The Policy ensures that enhanced DBS checks are mandatory for every staff member who has access to children or vulnerable adults as part of their normal duties or standard DBS checks for staff who have access to health care records. New staff are not allowed to start in post until their DBS and all other relevant pre-employment checks have been completed. Such checks must be satisfactory and in line with national NHS safe recruitment standards.

In line with the requirements of this Policy, all staff working with children or vulnerable adults are subject to enhanced DBS checks prior to being offered a contract of employment.

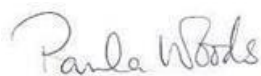
All Trust staff are required to display their identification badges on their person at all times to confirm to Schools and other providers that they are subject to this safeguarding process.

Where a DBS disclosure provides information about allegations and/or convictions relating to children or an allegation is made about an existing member of staff, the nominated Senior Officer will share that information with the Local Authority Designated Officer in accordance with the requirements of Safeguarding Vulnerable Groups Act 2006.

If you have any further queries, please do not hesitate to contact the Trust's Human Resources Department via the contact details detailed at the top of this letter.

We are more than happy to work with you and members of your Team to confirm/validate our staff members' identification when they present at your premises.

Yours sincerely



Paula Woods
Assistant Director

