

# DERBY COLLEGE GROUP

## POLICY



## PROCEDURE

# Safeguarding

Owning Policy:	Safeguarding Policy
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**POLICY – PROCEDURES – GUIDELINES – RELATED DOCUMENTS**

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## Section 1: Introduction

DCG places the highest importance on safeguarding, and the safety and well-being of students and apprentices is paramount in all College activities. Furthermore, DCG recognises that employees/volunteers and students have an important role to play in safeguarding, in particular the welfare of young people and vulnerable persons and preventing abuse and/or harm. DCG also acknowledges that at any time any person could be classed as 'vulnerable'.

In order to comply with this duty of care, all employees/volunteers must be aware of the lines of communication and levels of responsibility which exist to ensure that matters of safeguarding can be dealt with adequately.

These Safeguarding Procedures set out a framework for those arrangements.

The scope of the arrangements include.

Young people under the age of 18.

Adults at risk:

- Someone over the age of 18 who has a need for care and support
- Someone who is experiencing or is at risk of neglect or abuse

As a result of the above needs, the adult is unable to protect himself or herself against the abuse, neglect, or exploitation, or the risk of it. The term 'Adult at Risk' is now more commonly used in place of 'Vulnerable Adult', as 'Vulnerable Adult' may wrongly imply that some of the fault for the abuse lies with the victim.

Disqualification by association applies to any person working in early years' provision and those working in later years' provision for children who have not attained the age of eight including before school settings, such as breakfast clubs and after school provision. It also covers people who are directly concerned in the management of such early or later years provision.

DCG has a statutory duty placed on it by Keeping Children Safe in Education (September 2025) to have in place arrangements for carrying out its functions with a view to safeguarding and promoting the welfare of young people and vulnerable persons. This is further supported by Working together to safeguard children (2023), the Education Act 2011 and the Children Act 1989 and 2004 (Section 17 Child in Need (Provision of services for children in need, their families and others) and Section 47 Risk of Significant Harm (Local Authority's duty to investigate). DCG also has a duty to safeguard adults at risk in line with the requirements of the Care Act 2014.

## Section 2: Organisational Arrangements to Facilitate Safeguarding

### Governing Body

As outlined in Keeping Children Safe in Education (KCSIE) the governing body have a strategic leadership responsibility for DCG safeguarding arrangements and have the responsibility to ensure that DCG complies with safeguarding duties under legislation.

### The Leadership Management Safeguarding Group

The purpose of the group is to seek assurance from the Designated Safeguarding Lead (DSL) and Executive Director of HR that safeguarding arrangements, including relevant policies and procedures, are in place and that compliance, with these policies, is monitored to ensure that safeguarding is proactively and effectively managed. This group will also oversee compliance with the organisation's statutory duties as set out in the Children Act 1989, Education Act 2002, Children Act 2004 and the most up to date version of the statutory guidance, KCSIE.

### Safeguarding Operational Group

The key function of this group is to establish and maintain a safe learning environment, by enacting the safeguarding policies and procedures and by achieving the actions in the annual safeguarding work plan.

This group aims to promote a culture of understanding and co-operation across DCG to ensure the safety and welfare of all employees, volunteers, students, apprentices, contractors, subcontractors and visitors.

Working groups may be convened in response to specific issues, with key aims and objectives being set. These groups will report directly to the Safeguarding Operational Group.

This group is chaired by the Director of Health and Safety, DSL and Terms of Reference for the Safeguarding Operational Group are established.

## **Safeguarding Management Group**

The Safeguarding Management Group is responsible for responding quickly and appropriately to allegations of abuse made against employees/volunteers in line with this procedure.

The Safeguarding Management Group will comprise of:

- Chief Executive or nominated deputy
- Designated Safeguarding Lead or nominated deputy
- Director of Human Resources or nominated deputy

## **Section 3: Roles and Responsibilities for Safeguarding**

### **Chief Executive**

The Chief Executive has overall responsibility for all matters, including those involving safeguarding. This responsibility includes ensuring that safeguarding is addressed through comprehensive policies and procedures that are effectively implemented and appropriately resourced within the overall financial position of DCG.

The Chief Executive is assisted by the Director of Health and Safety who is DCG's nominated Designated Safeguarding Lead with responsibility for ensuring that the aims and objectives of DCG's Safeguarding Policy and supporting procedures are implemented.

### **Governors**

The Governing Body will nominate a Link Governor for Safeguarding who will liaise with the Designated Safeguarding Lead and attend DCG's Safeguarding Leadership Meeting. The link safeguarding governor role includes responsibilities for online safety.

Each member of the Governing Body also has an individual role in providing leadership and ensuring that all decisions reflect the intentions outlined in the Safeguarding Policy.

As outlined in [Keeping Children Safe in Education](#) the Governing Body have a strategic leadership responsibility for the school/College safeguarding arrangements and have the responsibility for ensuring that DCG complies with safeguarding duties under legislation.

### **Leadership Team**

Each member of the Leadership Team is responsible for ensuring that DCG Safeguarding Policy and supporting procedures are implemented. They will also:

- Have responsibility for all matters of safeguarding within their areas of responsibility.
- Be individually responsible for ensuring the introduction of agreed College initiatives, which will facilitate the implementation of DCG Safeguarding Policy and supporting procedures in full.

### **Director of Health and Safety (Designated Safeguarding Lead)**

The Director of Health and Safety is the Designated Safeguarding Lead for DCG and has lead responsibility for:

- Dealing with child protection and adults at risk person issues
- Providing advice and support on all matters relating to safeguarding
- Overseeing the successful implementation of the Policy and supporting procedures
- Liaising with external agencies, where appropriate, on any disclosures received.
- Ensuring that there is a robust network of Safeguarding Officers across DCG who are appropriately trained
- Taking a lead role in liaising and working with Local Safeguarding Children Boards, Safeguarding Adults Boards and other agencies as required

- Ensuring that DCG operates safer recruitment practices in accordance with statutory requirements and in conjunction with the Executive Director of HR
- Attending training commensurate with the role, including updated DSL child protection training every two years
- Attending, when necessary, case strategy meetings with the designated officer from the relevant local authority in respect of safeguarding issues, and in liaison with the Director of Human Resources or their nominated deputy
- Ensuring an Annual Report is produced and presented to the Governing Body
- Ensuring that DCG has appropriate resources available for safeguarding
- In liaison with the Executive Director of HR ensure that risk assessments are undertaken following any employee's disclosures
- Informing the ESFA if DCG or one of its subcontractors is subject to investigation by the local authority or the police
- Ensuring that systems are in place to support Care Leavers attending College
- Ensuring that systems are in place for the safe and secure transfer and receipt of confidential safeguarding files, in accordance with relevant local authority requirements
- Ensuring that safeguarding records are retained, stored and destroyed in the appropriate manner
- Providing evidence and reassurance to the Safeguarding Leadership Meeting that DCG is compliant with its roles and responsibilities with regards to Safeguarding Policy Procedures and Guidelines

The DSL has lead responsibility for online safety and filtering and monitoring arrangements at DCG

They are also the nominated College Prevent Lead and are responsible for:

- Updating the Operational Safeguarding Group on progress on Prevent and any other relevant areas
- Attending Derby Prevent Steering Group and reporting back into DCG for action to be taken as appropriate
- Leading on DCG Prevent Risk Register and Action Plan

- Promoting the requirement for adequate arrangements to be in place for identifying employees' safeguarding training needs, and that suitable and sufficient training is provided at all levels
- Attending sub-committees/working groups of DCG's Safeguarding Board and external agencies, where appropriate
- Advising upon, and contribute to the development and production of policies and procedures, in accordance with current legislation, regional and national policy etc
- In conjunction with the Team Manager – Safeguarding and other relevant managers be responsible for the monitoring of all safeguarding issues throughout DCG, ensuring that effective strategies and monitoring regimes are introduced where necessary
- Input into the production of an annual report to present to the Safeguarding Leadership Meeting, Safeguarding Operational Group, Governing Body
- Monitoring and managing DCG's External events and external speakers register

Also see responsibilities set out in KCSIE Annex C

### **Deputy Designated Safeguarding Lead**

The Team Manager – Safeguarding is DCG's nominated deputy in the absence of the Designated Safeguarding Lead and will attend training commensurate with this role.

The Team Manager – Safeguarding is responsible for:

- Co-ordinating and monitoring the arrangements for safeguarding throughout DCG, including access to and the provision of Safeguarding Officers across DCG
- Undertaking training to provide them with the knowledge and skills required to carry out the role, which should be updated at least every two years
- Developing and delivering training, including new starter induction and Safeguarding Officer training
- Use appropriate media to circulate information to all relevant employees/volunteers/ students of DCG on matters relating to safeguarding

- Supporting the DSL in producing safeguarding reports (approved by the DSL) to present to the Safeguarding Operational Group, Safeguarding Leadership Meeting and Governing Body
- Attending sub-committees, working groups both internally and externally, where appropriate.
- Contributing to the development and production of policies and procedures, in accordance with current Legislation, Regional and National Policy, etc
- In conjunction with managers, monitoring of safeguarding issues throughout DCG, ensuring that effective strategies and monitoring regimes are introduced where necessary
- Ensuring that systems are in place for the recording and monitoring of safeguarding disclosures in order to undertake statistical analysis, to inform the safeguarding training strategy for DCG
- Chairing the Safeguarding Operational Group in the absence of the Designated Safeguarding Lead
- Chairing DCG's Safeguarding Team meeting
- Acting as DCG's Child Sexual Exploitation (CSE) Champion
- Managing safeguarding cases

### **Safeguarding Team**

The Safeguarding Team is responsible for:

- Receiving, recording, and passing onto external agencies, where appropriate and following consultation with the Designated Safeguarding Lead or their nominated Deputy, disclosures in accordance with DCG procedures
- Liaising with the Designated Safeguarding Lead or their nominated Deputy as appropriate.
- Providing advice and support to other employees/volunteers on issues related to young people and vulnerable persons
- Informing parents/carers, where appropriate, and following consultation with DCG's Designated Safeguarding Lead (or nominated Deputy), in line with DCG's Disclosure to Parents/Carers Procedure
- Attending training commensurate with the role

- Keeping themselves up to date with any changes in DCG policy/procedures or legislative changes
- Attending DCG meetings commensurate with the role

### **Safeguarding Coordinators**

The Safeguarding Coordinators are part of the Safeguarding Team and are DCG's nominated deputies in the absence of the Deputy Designated Safeguarding Lead and will attend training commensurate with this role.

They are responsible for:

- Supporting the Team Manager – Safeguarding in the delivery of safeguarding training across DCG
- Attending relevant safeguarding meetings, both internally and externally.
- Monitoring safeguarding issues, in liaison with all relevant parties
- Managing safeguarding cases
- Developing and deliver safeguarding training

### **Safeguarding Advisors**

The Safeguarding Advisors are part of the Safeguarding Team and will attend training commensurate with this role and they are responsible for:

- Supporting the Safeguarding Coordinators
- Attending relevant safeguarding meetings, both internally and externally
- Monitoring safeguarding issues, in liaison with all relevant parties
- Managing safeguarding cases
- Deliver safeguarding training

### **Team Managers**

Team Managers are responsible for the welfare of employees and students whom they supervise and manage, and all users of those workplaces, which they control.

They must maintain close liaison with their employees in safeguarding matters and they are responsible for the following:

- Ensuring the implementation of any safeguarding policies or procedures approved by DCG within their own area and that they are brought to the attention of, and made available to, employees, volunteers, students, contractors, and visitors within the area
- Ensuring that there is a system in place for ensuring employees' attendance at mandatory training
- Ensuring that suitably and sufficiently trained persons are identified and available within their areas of responsibility to support the application of safeguarding legislation and DCG policies/procedures
- Ensuring that individual job descriptions and person specifications clearly define the role, the tasks and skills needed to reflect the level of responsibility in relation to safeguarding.
- Ensuring that Safer Recruitment practices are applied when recruiting to posts
- Ensuring that the services within their control provide a healthy and safe environment, whilst taking on board diverse cultural aspects of DCG and local community
- Ensuring that contractors/subcontractors working on DCG premises comply with the safeguarding regulations, which will be made available and clear to them when they tender for work. They must conform to DCG's safeguarding standards, which will include the employment of competently trained personnel and ensuring that they meet their statutory obligations
- Ensuring that there are processes in place in their areas of responsibility for the checking of DBS Certificates (in line with DCG requirements) in respect of external agencies supporting students whilst on DCG premises or undertaking off-site College activities.
- Ensuring that an events and external speakers' approval form is completed by their employees for all events in a timely fashion in order that they can be approved prior to the event taking place. It is the responsibility of the Team Manager who has for the area in which the event is taking place, to approve the event

## **Line Managers**

Line Managers are responsible for:

- Ensuring the adequate induction of all new employees/students/apprentices/contractors/volunteers emphasising the safeguarding aspect of their duties
- Ensuring that departmental policies, procedures, and assessments are in line with overall DCG policies and procedures
- Ensuring safeguarding training needs (including refresher training) for employees are identified within the management process
- Monitoring employees' attendance at agreed training sessions
- Ensuring that personal assessment plans are undertaken for all vulnerable persons within their area, and that employees conducting these assessments are suitably trained in the process and can use action plans that result from the assessments. Appropriate documentation of such assessments should be kept
- Ensuring that effective communications on safeguarding are in place
- Ensuring that they approve any external speakers and events taking place within their areas of responsibility in a timely fashion and forwarding the completed documentation to the DSL for inputting onto DCG's database
- Liaising with their HR Business Partner to ensure that a robust supervision timetable is in place for all new starters until such a time as DBS clearance is obtained

## **Vice Principal of Student Experience & Pastoral Support**

The Vice Principal of Student Experience & Pastoral Support is responsible for:

- Implementing, co-ordinating and maintaining the vetting of all employer premises for all work experience placements in line with DCG Policy and Procedures, to ensure that a safe and secure environment is established in all aspects of the work experience opportunities
- Acting as DCG Mental Health Lead

## **Student Experience and Pastoral Lead**

The Student Experience and Pastoral Lead acts as the Designated Teacher for Children In Care/Care Leavers.

## **Director of Human Resources**

The Executive Director of Human Resources is responsible for:

- Ensuring that HR systems, policies and procedures pay full regard to the guidance set out in 'Keeping children safe in education' and 'Working together to safeguard children'
- Ensuring that the employment of people within DCG fulfils the requirements of Safer Recruitment, including having in place a supervision timetable where necessary
- Ensuring that there is a system in place for maintaining and monitoring DCG's Single Central Record
- Ensuring that risk assessments are undertaken following any DBS Certificate disclosures.
- Attending, when necessary (or appointing a nominee to attend) case strategy meetings with the designated officer or their designated representative from the relevant local authority in respect of safeguarding issues relating to an employee, reporting back to DCG and taking appropriate action
- Ensuring that systems are in place for obtaining written confirmation that fee-funded ITT trainees who are undertaking work placements at DCG, have undergone all pre-appointment checks prior to commencing study with DCG
- Ensuring that appropriate checks are carried out on employees who move between roles within DCG
- Ensuring that systems are in place to obtain relevant DBS information for contractors/volunteers working within DCG
- Ensuring that records of allegations against employees (including low level concerns) are kept and reviewed

## **Estates Management Team**

The Estates Management Team are responsible for:

- Ensuring that all contractors satisfy safeguarding requirements under their statutory obligations and providing information to contractor employees
- Liaising with the Designated Safeguarding Lead or nominated deputy on all issues related to safeguarding the welfare of young persons and vulnerable persons
- Liaising with HR to ensure that DCG has up-to-date records of contractors based on DCG premises or who meet any statutory guidance requirements

### **Procurement Representative**

The Procurement Representative is responsible for:

- Ensuring that all procurement documents detail the requirements for safeguarding.
- Ensuring that all contractors on DCG's Approved Contractor List fulfil their contractual obligations in so far as they relate to safeguarding.

### **Employees**

All employees have a responsibility to co-operate fully with their supervisors and managers to ensure that DCG, as their employer, can carry out its responsibilities.

All employees have a legal duty of care to others. Regardless of the position held within DCG they must:

- Co-operate with each other and work in accordance with any policies, procedures, regulations, codes of practice and information or training provided
- Inform the Designated Safeguarding Lead (or nominated deputy) of any student that has disclosed to them that they are being supported by an external agency(ies), e.g. Child & Adolescent Mental Health Services (CAMHS) as soon as possible, but within one working day for contact to be made
- Ensure personal safeguarding training needs are identified within the managing for performance process

- Take responsibility for attending agreed training sessions
- Report any safeguarding concerns in accordance with DCG procedures
- Participate in training sessions about safeguarding as requested by their line manager
- Be aware of and participate in the risk assessment process.
- If requested, supervise an individual who does not have relevant DBS/safeguarding requirements in place
- Disclose to HR any change in circumstances which impacts on their ability to work with children and/or vulnerable persons in the course of their employment and in line with their Contract of Employment
- Be aware of:
  - The Stopping Domestic Abuse Together initiative (known nationally as Operation Encompass), a police-led early domestic abuse notification to schools
  - The safeguarding response to children who are unexplainable and/or persistently absent from education
  - The safeguarding response to child-on-child abuse
  - The early help process for low level and emerging needs and understand their role in it.
  - The process for making a referral to local authority children's social care, the statutory assessments that may follow this and the role they may play in such assessments
- Know what to do if a child tells them they are being abused, exploited, or neglected and can reassure children they are being taken seriously, will be supported, and kept safe
- Know what to do if a child shares, produces or receives a sexual communication, including sharing nudes/ semi-nudes
- Know what to do if a parent or carer shares any concerns about a child
- Be aware:
  - Children may not feel ready or know how to tell and/or might not recognise their experiences as harmful and that certain children may face additional barriers to telling

- Any child may benefit from early help and be alert to the need for early help for some groups of children
  - Of the indicators of abuse, neglect and exploitation, understand that children can be at risk inside and outside of the school/College, in their home, institutional or community setting and online
  - Children can abuse other children, referred to as child-on-child abuse, and the school/College policy to prevent and respond to it
  - Children with special education needs or disabilities (SEND), particularly those with neurodevelopmental conditions such as autism, as well as those with certain medical or physical health conditions are particularly vulnerable to online and offline abuse, exploitation, and neglect - and face additional barriers to the recognition of this abuse
  - Technology is a significant component in many safeguarding and well-being issues
  - Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
  - That children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse
  - Of the 'one chance' rule with suspected or actual victims of forced marriage and so called 'honour-based' abuse. i.e. they may only have one opportunity to speak to a victim or potential victim to offer appropriate support and advice
  - Of the indicators which may signal children are at risk from, or involved with, serious violent crime
- Be mindful that early information sharing is vital to identifying and tackling all forms of abuse, neglect, and exploitation and in promoting children's welfare, including in relation to their educational outcomes

## **Teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police

where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. (See further guidance under Female Genital Mutilation)

## **Volunteers**

All volunteers have a responsibility to co-operate fully with DCG so that it can carry out its responsibilities and have a legal duty of care to others. Volunteers must:

- Co-operate and work in accordance with any policies, procedures, regulations, codes of practice and information or training provided
- Report any safeguarding concerns in accordance with DCG procedures
- Participate in training sessions about safeguarding as requested
- Be aware of and participate in the risk assessment process

## **Little Explorers Nursery**

The Director of Health and Safety (DSL) is the Nominated Person for the Little Explorers Nursery and has day-to-day responsibility for child protection issues within the Nursery, which is subject to a separate policy and procedures. The Nominated Person will liaise with the Nursery Operations Manager or nominated deputy as appropriate. The Operations Manager is trained to act as a Deputy Designated Safeguarding Lead.

## **Section 4: Training and Information**

The training of governors and all employees, volunteers and students is an essential element of having successful safeguarding arrangements in place.

The information, instruction and training of all persons is seen as a fundamental part of providing a safe learning environment. Training for employees/volunteers should be provided at the start of employment (induction) and then on a regular basis throughout employment. This continual training programme is to ensure high standards are maintained for the benefit of employees, volunteers, students and the public.

When joining DCG all employees and volunteers undertake mandatory safeguarding training in two parts during the induction period. Part one and part two are online safeguarding modules. This training cover types of abuse, early help assessments, local arrangements, safeguarding disclosure procedures and tests knowledge and understanding of KCSIE Part One, which is issued to all employees to read prior to the training.

All employees will receive an electronic copy of, have read and confirmed to say that they have read, and understood KCSIE.

Part 1: All employees

Part 2: All Governors and Leadership Team

Part 3: Human Resources

Part 2, 3, 4, 5 and Annex A-F: Safeguarding Team and Safeguarding Governor

In addition to the safeguarding training at induction, all employees and governors will receive safeguarding training appropriate to their roles and responsibilities which is regularly updated as well as Prevent Duty, and online safety training, so they are equipped with the knowledge and skills to keep children safe. They will also receive regular safeguarding and child protection updates at least annually to help provide them with an awareness of safeguarding issues that can put children at the risk of harm ensuring they have the relevant skills and knowledge to safeguard children effectively.

Those involved with the recruitment and employment of employees to work with children will have received appropriate safer recruitment training.

In addition to formal training at the point of induction and annual renewal of training, further information and briefings are provided for employees and governors throughout the year via safeguarding newsletters, briefing documents, external speaker briefings and presentations from key agencies and professionals. The DCG safeguarding team have developed a bespoke series of online safeguarding modules which covers safeguarding issues in response to local and national trends. These include Suicide Awareness, Self-Harm, Child Exploitation, Bullying, domestic

Abuse, Sexual Harassment. This training is rolled out to all employees and training selected is timely with topics chosen to meet current needs.

The governors safeguarding training and updates will enable them to have the knowledge to provide strategic challenge to test and assure themselves that safeguarding processes and procedures are effective and robust and a whole College approach to safeguarding is in place.

Further training will be delivered to individuals commensurate with their roles and responsibilities with DCG.

All training provided should be recorded and evidence kept that training has taken place.

### **Section 5: Systems for Children to Report Concerns and Abuse**

DCG recognises the importance of ensuring that all children feel heard and understood. We have a culture of listening to children and taking account of their wishes and feelings in any measures DCG may put in place to protect them. Whenever there are any concerns, the child's wishes will be considered when determining what action to take and what services are provided. The welfare and safety of a child is of paramount concern and employees will act in the best interests of the child.

We understand the difficulties that children may have in approaching employees about their circumstances and any concerns they may have. Some children may feel unable to report their concerns or abuse, others may have additional barriers to telling someone or not recognise what is happening is abusive.

DCG has an open and accepting attitude towards children and promotes a positive and supportive environment as part of our responsibility for pastoral care. DCG ethos promotes trusted relationships between students and all employees which supports children to tell staff about any concerns they may have.

Children, parents/carers, and all employees will be free to talk about any concerns and see DCG as a safe place. Many children can show signs or act in ways they hope adults will notice or react to, others may make indirect reports via a friend, or employees may overhear conversations. All employees are alert to this and to the potential need for early help and are aware of the indicators of abuse, exploitation and neglect and know what actions they should take.

DCG has systems in place for children to complain and/or confidently report their concerns, including any form of abuse or neglect, including child-on-child abuse, and know that their concerns will be treated seriously.

Various reporting methods are promoted to students/apprentices during induction, tutorials, via posters and electronic noticeboards throughout their time at College. Students/apprentices are encouraged to share their concerns by talking to a trusted employee, speaking to a member of the welfare team or alternatively they can email: [safeguarding@derby-college.ac.uk](mailto:safeguarding@derby-college.ac.uk) or have a live chat on Teams. QR codes are promoted on posters for students to scan, which opens a live chat with a member of the safeguarding team.

## **Section 6: Dealing with a Safeguarding Disclosure or a Concern**

All disclosures, concerns, allegations or suspicions of abuse must be taken seriously.

Absolute promises of confidentiality should not be given as the matter may develop in such a way that these promises might not be able to be honoured as third parties may need to be involved/informed or consulted.

If the disclosure comes directly from the young person or adult at risk, questions should be kept to the minimum necessary to understand what is being disclosed. Leading questions must always be avoided.

It is recognised that any employee/volunteer may encounter students who make a safeguarding disclosure or who exhibit a safeguarding cause for concern. No employee/volunteer should take any independent action themselves (i.e. a non-

member of the Safeguarding Team calling Social Care) but must observe the protocol set out below, unless the individual is in crisis, in which case action should be taken to stabilise the situation, in consultation with relevant managers.

Any suspicion, allegation or incident of abuse must be reported to the Safeguarding Team, or if one is unavailable the Designated Safeguarding Lead (or nominated Deputy) **within one hour of disclosure.**

A full record of any disclosure conversations must be made immediately after any conversations with the young person or vulnerable person by adding an incident to the Child Protection Online Management System (CPOMS) which is a safeguarding case management system which enables employees to add details of a safeguarding concern and record all follow up action. The CPOMS online incident form should be completed by the person to whom the disclosure was made. It must include, if known:

- The date and time of the alleged abuse
- The place where the alleged abuse happened
- The young person/vulnerable person's name
- The name of the person making the disclosure
- The nature of the alleged abuse
- A description of any injuries observed (NB: Do not ask to see them)
- A body map (to record location of injuries if disclosed)
- The account which has been given of the allegation. (If disclosed directly by the young person or adult at risk, the account should be in their own words.)
- Contact details of the young person/vulnerable person
- The date and time of the observation/disclosure
- The name(s) of any other person(s) present
- Safeguarding Officer to whom the disclosure has been passed

The record should be, as far as possible, verbatim rather than summarised and it should be factual in terms of what the young person/vulnerable person or person making the disclosure (where not a direct disclosure) has reported and should not be based on opinion or assumptions.

Young people or vulnerable people with learning difficulties and/or disabilities may need additional support when making a disclosure. This may take the form of the young person/vulnerable person's nominated support being present at any interview to act as a facilitator or in an advocacy role. It should never be assumed that a young person/vulnerable person with learning difficulties and/or disabilities is not capable of providing credible evidence.

NB When employees are referring a safeguarding concern via CPOMS they must also contact (by phone/Teams) the safeguarding officer they are assigning the disclosure to, in order to ensure they are available to pick this up. If not, a referral can be made to another member of the safeguarding team.

The Safeguarding Team/Designated Safeguarding Lead (or nominated Deputy) should record details of the suspected/alleged abuse, neglect or exploitation and a log of all actions taken on CPOMS and should refer the matter to the appropriate external agency(ies) where they feel that the vulnerable person may be in need and/or may be at risk of suffering significant harm.

The Safeguarding Team/Designated Safeguarding Lead (or nominated Deputy) will confirm any telephone referral by submitting a DDCSP online written social care referral form within one working day.

A record should be kept of the time of the referral and the name of the person (and agency) to whom the referral was made on CPOMS.

The advice received from the referral agency on what action, if any, is to be taken should be recorded on CPOMS.

Any action to be taken by DCG, including that agreed with the referral agency should be noted and the Safeguarding Team/Designated Safeguarding Lead (or nominated Deputy) needs to confirm that this action is being/has been taken.

A chronology should be kept and maintained up to date for all safeguarding disclosures on CPOMS.

Any safeguarding concerns related to extremism or radicalisation should also follow the same process for referrals. Where appropriate the Designated Safeguarding Lead (who is also the Prevent Lead contact) will also refer the case into the East Midlands Prevent Team by submitting a Prevent referral form.

**See Appendix A:** Flowchart for action following a safeguarding disclosure or suspicion or a child protection/safeguarding issue.

**See DCG Safeguarding Guidelines document** for CPOMS user guide on the DCG intranet.

### **Notifying parents/carers**

DCG will normally seek to discuss any needs or concerns about a young person under the age of 18 with their parents or carers. This must be handled sensitively.

In situations where there are serious/complex needs or child protection concerns the Designated Safeguarding Lead (DSL) or their nominated Deputy will contact the parent or carer. However, if DCG believes that notifying parents could increase the risk to the young person or exacerbate the problem, then advice should be sought from the Designated Safeguarding Lead or their nominated Deputy, in reference to the Disclosure to Parents/Carers Procedure.

Where an Early Help Assessment would benefit the young person and their family, the most appropriate member of staff should approach the parent/carer to take this forward.

### **14 – 16-year-old students**

Where a suspicion/allegation of abuse is made in respect of a 14 - 16-year-old student, who is enrolled at a school or with another sponsor, employees should contact the 14

- 19 School Manager or nominated deputy. The 14 - 19 School Manager (or nominated Deputy) will liaise with the Child Protection Officer from the student's school or sponsor, ensuring that the student is informed of this process.

### **Managing student behaviour**

If through the investigation of disclosures, it is identified that College Student Code of Conduct rules have been broken, the matter should be referred to the Behaviour for Learning Team for appropriate action to be taken.

## **Section 7: Support for Employees Dealing with Safeguarding Concerns**

DCG recognises that employees/volunteers who have been involved with a young person or vulnerable person who has suffered harm or appears to be likely to suffer harm may require support. Employees/volunteers can obtain support either via their line manager, a member of the safeguarding team, Human Resources, trade unions, referral to Occupational Health or the 'Be Supported' Employee Assistance Programme.

The Designated Safeguarding Lead (and deputies) have access to external professional supervision support. The Safeguarding Team also have access to supervision support (provided by the DSL, Deputy DSLs) and are also supported via Safeguarding Team meetings where support, briefings and training is provided.

## **Section 8: Online Safety**

Online safety and protecting learners from potentially harmful and inappropriate online material forms part of the whole college approach to safeguarding, including policies, curriculum, employee training, roles and responsibilities of the designated safeguarding lead and parental engagement. DCG has filtering and monitoring systems in place, these are regularly reviewed for their effectiveness and the leadership team and relevant staff escalate concerns when identified. DCG protects and educates students and employees in their use of technology, including where

they are learning remotely, and has mechanisms to identify, intervene and escalate any concerns where this is needed.

DCG E-safety policy outlines how the four areas of risk, content, contact, conduct and commerce, will be addressed to protect and educate learners and staff. It also incorporates the policy on the use of mobile and smart technology. DCG is also in regular communication with parents and carers and uses these communications to reinforce online safety and the systems DCG use to protect children from online harms.

To ensure that online safety is effective, especially as technology and the associated risks and harms evolve and change, DCG undertakes an annual review and risk assessment.

See [DCG E-safety Policy](#)

## Section 9: Record Keeping and Information Sharing

The Designated Safeguarding Lead shall ensure in line with Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) that arrangements are in place for retaining a copy of:

- The incident form (CPOMS record) (and report where appropriate)
- Any notes or other correspondence dealing with the matter which are detailed, accurate, secure and all concerns, discussions and decisions made include the rationale for those decisions e.g. where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.
- Any other relevant materials

Copies of safeguarding files will be stored securely and kept until the child is 25 years old (this is seven years after they reach the school leaving age). (Information and Records Management Society (IRMS), 2016)

Copies of reports regarding allegations made against employees are kept securely with access strictly controlled (and limited to those who are entitled to see it as part

of their duties) in a separate location within DCG's electronic document management system (DMS) by Human Resources until the accused has reached normal retirement age or for a period of ten years from the date of the allegation if that is longer. (IRMS, 2016). This applies to volunteers and paid employees.

Details of allegations that are found to be malicious will be removed from employee's personnel file. For all other allegations a clear comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached will be kept on the confidential personnel file and a copy provided to the employee.

## **Information Sharing**

DCG recognises the importance of information sharing between the school/College and local agencies to effectively safeguard our students. The setting operates with regard to HM Government [Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (2018) and DDSCP [Information Sharing Guidance for Practitioners](#) (2022).

All staff will be mindful of the seven golden rules to sharing information and [Data Protection Act](#) (2018) and [UK General Data Protection Regulation](#) (UK GDPR) obligations.

The General Data Protection Regulation (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. There are instances where confidential information can be lawfully shared, i.e., if it can be justified in the public interest. This would include:

- To protect a young person from harm or protect vulnerable persons from serious harm;

- To promote the welfare of children;
- To prevent crime and disorder.

DCG should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of a child, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

Wherever possible consent should be sought to share information. When seeking consent be open and honest with the individual (and/or their family where appropriate) about why, how and with whom the information will, or could be shared. However, there will be some circumstances where consent to share information should not be sought from either the individual or their family, or information given that the information is to be shared. This would include:

- If by doing so places a person (the individual, family member, or a third party) at increased risk of significant harm if a young person, or serious harm if a vulnerable person; or
- Prejudicing the prevention, detection, or prosecution of a serious crime; or
- Leading to an unjustified delay in making enquiries about allegations of significant harm to a young person or serious harm to a vulnerable person.

A record should be kept of any decision made regarding information sharing, whether it is to share information or not. If the decision is made to share information the record should include what has been shared, with whom and for what purpose.

If there is any doubt about information sharing advice should be sought from the Designated Safeguarding Lead or their nominated Deputy.

All safeguarding suspicions, allegations and investigations must be kept confidential and shared only with those who need to know.

## **Section 10: Host Families**

Where DCG arrange for a visiting child to be provided with care and accommodation in the United Kingdom in the home of a family to which the child is not related the responsible adults will be engaging in regulated activity for the period of the stay. In circumstances such as this, DCG will carry out relevant DBS checks on all persons over the age of 16 who permanently reside in the host residence.

For host families aboard, the Visit Leader should liaise with the partner school/establishment to establish a shared understanding of, and agreement to the arrangements in place to safeguard College students. If necessary, the Visit Leader should contact the relevant foreign embassy or High Commission of the country in question to discuss what check(s) may be possible.

## **Section 11: Safer Recruitment**

DCG's Employee Recruitment & Selection Policy and supporting procedures ensure that all appropriate safer recruitment measures are applied in accordance with Keeping Children Safe in Education (September 2025) in relation to everyone who works at DCG, including governors, employees, volunteers, and persons employed by external contractors/partners, including:

- Verifying identity and academic or vocational qualifications (where appropriate)
- Obtaining professional and character references and checking previous employment histories
- As part of due diligence on the preferred candidate, DCG will carry out an online search in order to help identify any incidents or issues that have happened, and are publicly available online, which DCG might want to explore with the applicant
- Obtaining relevant Disclosure & Barring disclosures for employees in line with their role and responsibilities in DCG and in accordance with Government guidance
- Undertaking risk assessments, as appropriate, following information received from DBS.
- Applying additional checks to all new employees who are non-UK nationals
- Keeping a single central record detailing the range of checks carried out on employees.

- In the case of temporary/agency employees operating on College premises, requiring them to agree to and abide by safeguarding conditions set out by DCG

DCG uses best practice and has adopted robust recruitment procedures as outlined in [Keeping Children Safe in Education](#) to deter and prevent people who are not suitable to work with children from applying, securing employment or volunteering opportunities in DCG. DCG applies all appropriate measures for employees, including volunteers, agency and third-party staff (agency staff) trainees/student teachers, governors/trustees, and contractors. This forms a vital part of the whole college approach to safeguarding and is an essential part of creating a safe environment for our students.

Those involved with the recruitment and employment of employees are required to have undertaken appropriate safer recruitment training and at least one person who conducts an interview is required to have completed safer recruitment training.

Safer practice in recruitment means thinking about and including issues to do with child protection and safeguarding children at every stage of the process from advertising, job descriptions/person specifications, application forms, shortlisting, employment history and references, selection and pre-appointment vetting checks.

DCG maintains a single central record of pre-appointment checks consistent with [Keeping Children Safe in Education](#).

## **Section 12: Arrangements for the Secure Storage, Handling, Use, Retention and Disposal of DBS Disclosures Information**

As an organisation using the Disclosure & Barring Service (DBS) to help assess the suitability of applicants for positions of trust, DCG will comply fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures information. It will also comply fully with its obligations under the General Data Protection Regulations and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information and has a

written policy on these matters, which is available to those who wish to see it on request.

### **Storage and Access**

DBS checks are conducted via an online service with DCG only retaining a record of the disclosure number, date of issue, level of check and any details, for example appertaining to any risk assessment conducted. That record is held on DCG's HR system; on the Single Central Record (SCR); and the individual's DMS file. Access is strictly controlled and limited to those who are entitled to see it as part of their duties.

### **Handling**

In accordance with Section 124 of the Police Act disclosure information is only passed to those who are authorised to receive it in the course of their duties. DCG maintains a record of all those to whom disclosures or disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### **Usage**

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### **Retention and Disposal**

Once a recruitment (or other relevant) decision has been made, DCG retains disclosure information as part of that process for a period of twelve months to allow for the consideration and resolution of any disputes or complaints. Any risk assessment conducted in relation to a disclosure will be retained within the employee's personnel file within DCG's DMS.

If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than twelve months, DCG will consult the DBS about this and

will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time the usual conditions regarding the safe storage and strictly controlled access will prevail.

Once the retention period has elapsed, the employee's application form which may contain disclosure information is automatically deleted from the HR system.

Any paperwork associated with the recruitment process, for example recruitment/interview packs which may contain disclosure information is destroyed by secure means by DCG's confidential shredding service. While awaiting destruction, disclosure information will be kept in a lockable secure receptacle. DCG will not keep any photocopy or other image of the disclosure or any copy of representation of the contents of a disclosure. However, notwithstanding the above, DCG may keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, and the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

### **Section 13: Recruitment of Ex-Offenders**

The Rehabilitation of Offenders Act enables criminal convictions to become 'spent' or ignored after a 'rehabilitation period'. Under the Criminal Justice and Court Service Act, however, it remains an offence, punishable by imprisonment for anyone either convicted of or cautioned for a Schedule Four offence to apply to work with children, young people or vulnerable persons. It is also an offence for anyone knowingly to employ such a person in such a capacity either on a paid or voluntary basis.

It is a requirement of the DBS's Code of Practice that all Registered Bodies must treat disclosure applicants who have a criminal record fairly and that they do not discriminate because of a conviction or other information revealed. It also obliges Registered Bodies to have a written policy on the recruitment of ex-offenders. (A copy of DCG's Statement on the Recruitment of Ex-Offenders can be found on the DCG website's recruitment page.

## Recruitment of Ex-offenders

The following has been developed to help DCG meet the requirements of the DBS's Code of Practice.

- As an organisation using the Disclosure & Barring Service to assess applicants' suitability for positions where employees or potential employees will care for, train, supervise or are in sole charge of children, young or vulnerable persons, DCG complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a disclosure on the basis of a conviction or other information revealed.
- DCG is committed to the fair treatment of its employees, potential employees or users of its services, regardless of gender, race, nationality, ethnic or national origins, marital status, sexual orientation, political or religious beliefs and activities, family responsibilities, class, physical, sensory, mental or other forms of disability or medical condition.
- DCG actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcomes applications from a wide range of candidates, including those with criminal records. DCG selects all candidates for interview based on their skills, qualifications and experience.
- For those positions where a disclosure is required, job adverts and recruitment briefs will contain a statement that a disclosure will be requested in the event of the individual being offered a position.
- Where a disclosure is to form part of the recruitment process and in line with legislative requirements, DCG encourages all applicants called for interview to provide details of their criminal record at an early stage in the application process. DCG will request that this information is given in person to a designated person in the HR Department and DCG guarantees that this information will only be seen by those who need to see it as part of the recruitment process.  
Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- DCG ensures that all those in DCG who are involved in the recruitment process have been suitably trained to identify and assess the relevance and

circumstances of offences. DCG also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act.

- DCG make every subject of a DBS disclosure aware of the existence of the DBS Code of Practice and makes a copy available on request.
- At interview, or in a separate discussion, DCG ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant. In certain circumstances it may be appropriate to conduct a confidential risk assessment with an individual where a disclosure reveals previous criminal convictions and/or cautions. Where this takes place the designated person within HR will make a record of the risk assessment and get the individual to sign it or confirm its accuracy by email. This is then forwarded to the Director of HR and the DSL for their approval. This will then be kept in a separate location within the DMS with access limited to designated people within the HR team. Having a criminal record will not necessarily bar someone from working for DCG. This will depend on the nature of the position and the circumstances and background of disclosed offences.
- Should an applicant wish to complain about information disclosed, a Complaints Procedure is available directly from the DBS.
- DCG will co-operate with requests from the DBS to undertake assurance checks as to the proper use and safe keeping of disclosure information.
- DCG will also report to the DBS any suspected malpractice in relation to the Code of Practice or any suspected offences in relation to the misuse of disclosures.

#### **Section 14: Procedure for Dealing with Allegations Against Employees or a Volunteer**

**All** concerns and or allegations about adults working in or on behalf of DCG (including agency teachers, contractors, and volunteers) will be reported, recorded, and dealt with promptly and appropriately.

DCG recognise there are two levels of allegation/concern:

1. Allegations that **may** meet the harms threshold

2. Allegations/concerns that **do not** meet the harms threshold, also known as 'low level concerns'

DCG's response to concerns/allegations will be consistent with the DDSCP Safeguarding Children [Allegations against Staff, Carers and Volunteers](#) procedure and will be in line with the DDSCP Briefing Note: [Low-Level Concerns about Staff](#).

### **1. Allegations that may meet the harms threshold**

This is where an allegation might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or College. Where it is alleged that anyone working in the establishment, including agency teachers, contractors and volunteers has:

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

This includes any behaviour that may have happened outside College and is known as transferable risk.

### **If you have concerns about another employee**

Employees who are concerned about the conduct of a colleague (including supply employees, contractors, and volunteers) must remember that the welfare of the child is paramount.

All concerns of poor practice or concerns about a child's welfare brought about by the behaviour of colleagues should be reported without delay to the Chief Executive Officer. Where there are concerns or allegations about the Chief Executive Officer this should be referred to the chair of governors. In a situation where there is a conflict of

interest in reporting the matter to the Chief Executive Officer (CEO) this should be reported directly to the Local Authority Designated Officer (LADO). The employee should make a record which will include time, date, place of incident, persons present, what was witnessed, what was said etc.

In addition to reporting the concerns about the behaviour of a colleague to the Chief Executive Officer, any concerns about the welfare of a DCG child/vulnerable person must be recorded on CPOMS and the incident assigned to the Designated Safeguarding Lead (or a Deputy DSL) in accordance with the *Flowchart for action following a safeguarding disclosure or suspicion or a child protection/safeguarding issue (Appendix A)*

After being notified of an allegation, the CEO will convene the Safeguarding Management Group, (CEO, DSL and Director of HR) who will consider the nature of the allegation and the evidence presented, and decide on the next appropriate course of action, e.g. suspension. (NB: Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension should be considered prior to taking that step.

The Safeguarding Management Group will:

- Ensure the employee/volunteer against whom the allegation is made are informed by HR orally and in writing that no further action will be taken. (Consideration should also be given to offering counselling/support.)
- Inform the parents/carers of the alleged victim (where appropriate) that the allegation has been made and of the outcome although not the details of any disciplinary sanction
- Where the allegation was made by a person other than the alleged victim, consideration should be given to informing the parents/carers (where appropriate) of that individual
- Prepare a report outlining the allegation and give reasons for the conclusion reached and confirm that the above action(s) have been taken

Where it is clear that a young person or vulnerable person appears to have been harmed or is at risk of significant harm or a criminal act appears to have been committed an immediate referral will be made by the DSL (or their nominated deputy) to Social Care and/or the Police for investigation.

The Executive Director of HR (or their nominated Deputies) will ensure that DCG operates within its Employee Disciplinary Policy & Procedure and notifies all relevant parties, i.e., designated officer from the relevant local authority, DBS, Department for Education.

The Chief Executive Officer and Executive Director of HR will ensure the Derby and Derbyshire Safeguarding Children Partnership *Allegations Against staff, Carers and Volunteers* are followed and adhered to. [Allegations Against Staff, Carers and Volunteers \(proceduresonline.com\)](http://proceduresonline.com)

DCG will not take any action that might undermine any future action or disciplinary procedure, or police investigation e.g., interviewing the alleged victim, alleged offender or possible witnesses before discussing this with the designated officer from the relevant local authority, when necessary. If appropriate, a multi-agency strategy group will be convened by the designated officer which will include representation from DCG.

DCG will seek advice from the designated officer from the relevant local authority about how, when and by who parents or carers should be informed unless there is an emergency situation, such as when a young person or vulnerable person has been injured and needs medical attention.

Any investigation conducted by DCG will follow the investigation process outlined in DCG's Disciplinary Procedure. Once the outcome of the investigation is determined DCG will take a view on how to proceed in line with its disciplinary policy and procedure. Any investigation should not undermine any police investigation. However, the outcome of DCG's disciplinary investigation and any action will not always be dependent on the conclusion and outcome of any police investigation.

Where an employee or volunteer is dismissed from DCG's employment or disciplined because of abusive conduct relating to a young person or vulnerable person, or they leave while under investigation for allegedly causing harm or posing a risk of harm, DCG will notify the DBS, as appropriate.

Where it is subsequently found that an allegation has been made maliciously DCG may refer the matter to be dealt with in line with its disciplinary procedures for employees and students.

## **2. Concerns that do not meet the harm threshold**

Allegations/concerns that do not meet the harms threshold are referred to as 'low-level concerns'. A low-level concern does not mean it is insignificant, rather that the behaviour towards the child does not meet the harm threshold as outlined above.

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of DCG may have acted in a way that is:

- Inconsistent with the employee code of conduct, including inappropriate conduct outside of work, or
- Does not meet the harm threshold or is not serious enough to consider a referral to the Local Authority Designated Officer (LADO)

DCG's Code of Conduct Guidelines lays down general principles which employees can use to determine appropriate behaviours and action. This Code helps employees to understand the values, standards, beliefs and behaviours that DCG expects them to demonstrate in carrying out their duties and responsibilities.

Employees should share low-level concerns in confidence with the Executive Director of HR (or if unavailable a member of the HR Team). The Executive Director of HR will report all low-level concerns to the Chief Executive Officer via the Safeguarding Leadership Meeting, or immediately if deemed appropriate. The Executive Director of HR will also liaise in a timely manner with the Designated Safeguarding Lead to confirm arrangements are in place to support the welfare of the child/vulnerable person.

Employees are also encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that they consider falls below the expected professional standards.

Reports about agency staff or contractors will be notified to their employers.

All low-level concerns will be recorded in writing to include details of the concern, the context and the action taken.

### **Section 15: Allegations About the Organisation**

DCG complies with the Education and Skills Funding Agency (ESFA) funding agreements and contracts requirements. The ESFA has included new safeguarding clauses in the funding agreements and contracts which requires the ESFA to be made aware when an institution is itself the subject of an investigation by the local authority or the police. The ESFA do not require details of all the safeguarding incidents an institution reports to the local authority or to the police, only where the institution itself, or one of its subcontractors, is subject to investigation. In such circumstances the Chief Executive Officer or the Designated Safeguarding Lead is required to email [Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk).

The ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is being or is scheduled to be investigated by the local authority and/or the police.

The main issues/referrals ESFA want to be notified about, where any funded students are concerned, are those that result in police investigations. ESFA needs to be sighted on these cases and satisfied the right action is in hand by responsible bodies.

The ESFA does not require institutions to routinely inform them about Prevent referrals to Channel panels. In line with the position on safeguarding more generally, the ESFA will only require institutions to inform them when an institution is itself, or one of its

subcontractors, is the subject of an investigation by the local authority or the police in connection with a Prevent issue. In such circumstances the Chief Executive Officer or the Designated Safeguarding Lead is required to email [Enquiries.EFA@education.gov.uk](mailto:Enquiries.EFA@education.gov.uk).

### **Allegations without foundation**

DCG recognises that false allegations may be indicative of problems of abuse elsewhere in the life of the accuser.

If after investigation the allegations were not substantiated, i.e., a malicious attempt to undermine an employee/volunteer a record should be kept, and consideration given by the Safeguarding Management Group to a referral to the designated officer from the relevant local authority in order that other agencies may act upon the information.

## **Section 16: Arrangements for Visitors**

DCG premises provide a safe learning environment with secure access. We recognise there are different types of visitors, those in a professional capacity, children's relatives or others visiting for college activities or visitors via a third party and have processes in place to ensure they are suitable, are checked and monitored as appropriate.

We recognise the importance of allowing access for local authority children's social care to conduct, or to consider whether to conduct an assessment and that employee from other partner agencies may need to visit to see a child or young person to either safeguard or promote their welfare.

See *DCG Visitor Protocol* for further information

### **Events and external speakers/visitors (Prevent Duty)**

In order to comply with the Counter Terrorism and Security Act 2015 which imposes a duty on Further Education Colleges to have due regard to the need to prevent people from being drawn into terrorism, DCG assesses risk for all external events and visiting speakers. A risk assessment should be completed by any employee who is responsible for organising external events. When deciding whether to host a particular event or speaker, the employee responsible should consider carefully whether the views being expressed or likely to be expressed constitute extremist views that risk drawing someone into terrorism or are shared by a terrorist group. In these circumstances the event will not be allowed to proceed except where DCG is entirely convinced that such risk can be fully mitigated without cancellation of the event.

This includes ensuring that, where an event is being allowed to proceed, speakers with extremist views that could draw people into terrorism are challenged and opposing views are represented as part of that same event, rather than in a separate forum. Where there is any doubt that the risk cannot be mitigated the event will not be able to proceed.

*See Guidelines for approval and further information*

### **Section 17: Arrangements for Student Work Placements**

Employers and training organisations will be required to co-operate with DCG in putting in place and subscribing to appropriate safeguards. Failure to do this will result in DCG not using them as a placement provider.

Refer to DCG's Health & Safety Vetting Procedures for Work-based Learning & Work Experience for further advice and guidance.

### **Section 18: Arrangements for Subcontracted Provision**

Employers and training providers will be required to co-operate with DCG in putting in place and subscribing to appropriate safeguards. These will be monitored and

managed by the Partnerships and Subcontract Manager and in consultation with the DSL, their nominated deputy and/or HR when required.

DCG will ensure that suitable and relevant information relating to safeguarding is disseminated to employees and College users. Consultation and communication over safeguarding issues will be encouraged at all levels within DCG. Communication will, so far as is reasonably practicable, be produced in a format that takes on board the needs of employees and College users.

## APPENDIX A

### Flowchart for DCG Safeguarding Procedure – action following a safeguarding disclosure or suspicion or a child protection/safeguarding issue

Student makes a disclosure to a college employee/volunteer of a child protection/safeguarding nature or if College employee/volunteer has concerns of a child protection/safeguarding nature -

- Do take the disclosure/concern seriously
- The student should not be questioned over the validity of the claim, nor should you attempt to investigate, question or probe further
- Do not promise to keep it a secret
- Do treat as highly confidential
- Remember you must inform the relevant Safeguarding Team, or if someone is unavailable the Designated Safeguarding Lead (or nominated Deputy) within **one hour** of disclosure  
If the suspicion or allegations of abuse is against an employee/volunteer it must be reported to the Chief Executive Officer (or nominated Deputy) within **one hour** of disclosure. Contact them via phone/Teams
- If there any injuries that require medical attention, contact a First Aider for advice on the appropriate medical treatment



Contact the relevant Safeguarding Officer (as outlined above) outlining the concern(s) and name of student



Complete a CPOMS online incident record and assign to the Safeguarding Officer to whom the concern was referred

**This must be on the same working day**

Safeguarding Officer to follow up disclosure and take appropriate action, with referral to the appropriate external agency where they feel that the young person/vulnerable person may be in need and/or may be at risk of suffering significant harm and complete and record of action on CPOMS



Refer to the DCG Behaviour and Engagement Team representative if there are concerns with regards to student behaviour in order for appropriate action to be taken

The CPOMS Incident record is a highly confidential document and all details of the event must be treated on a "need to know" basis only

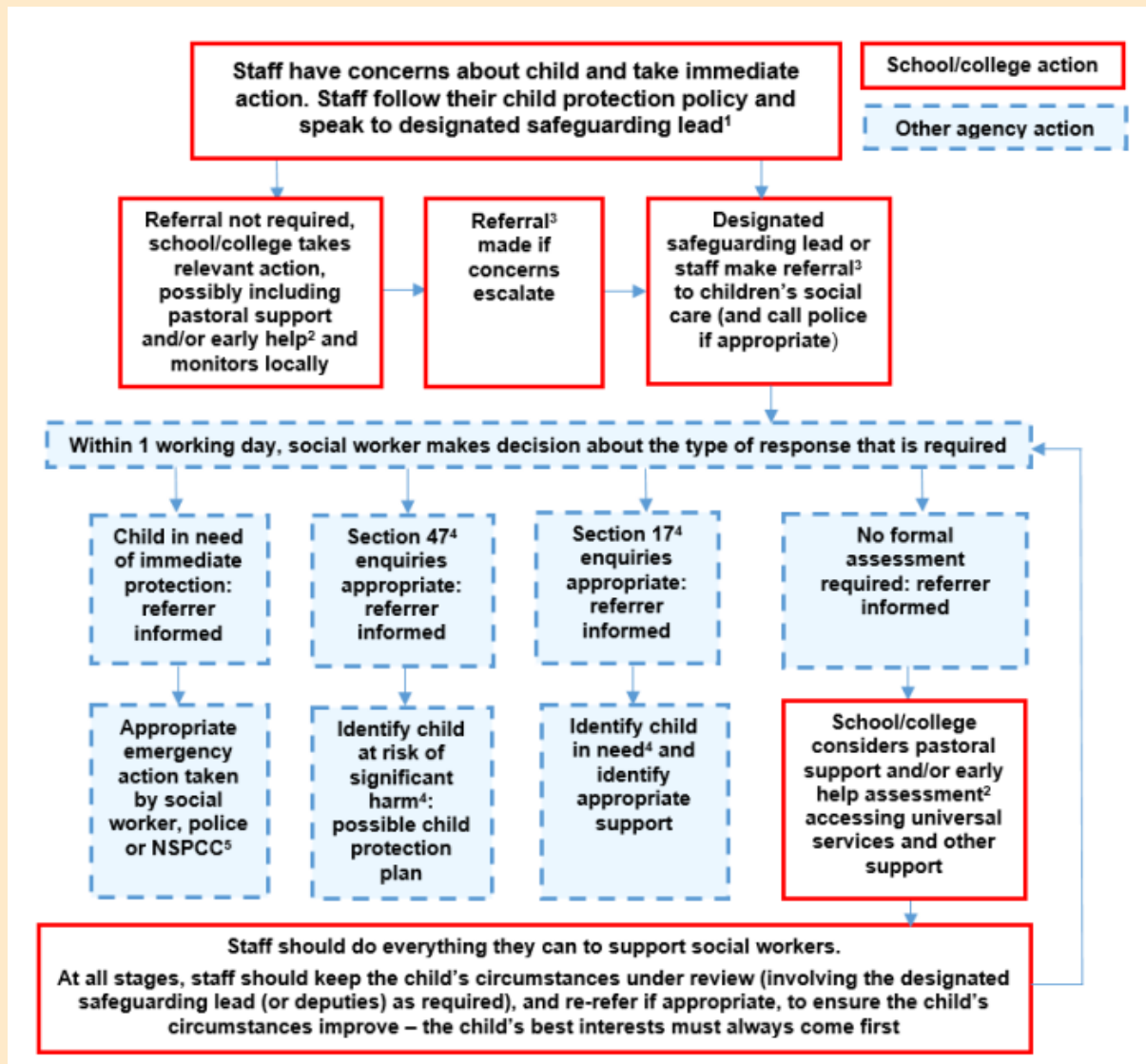
If you are needed to assist in any further investigation you will be contacted by the relevant Safeguarding Team/Designated Safeguarding Lead (or nominated Deputy)

If follow-up legal action is required a lapse of confidentiality or any inappropriate actions may seriously jeopardise any proceedings

## Appendix B

**Guidance Flowchart for Safeguarding Team – other agency action following a safeguarding concern raised in College**

NB source: Derby and Derbyshire Children's Safeguarding Partnership



## Appendix C

### Key Safeguarding Contacts

#### DCG employees with specific safeguarding responsibilities

Safeguarding Role	Name and Role	School/College contact details
<b>Designated Safeguarding Lead</b>	Robert Bamford Director of Health and Safety	<a href="mailto:robert.bamford@derby-college.ac.uk">robert.bamford@derby-college.ac.uk</a> 07395600045
<b>Senior Leader(s) available for contact in the absence of the designated safeguarding lead</b>	Heather Simcox Deputy CEO	<a href="mailto:heather.simcox@derby-college.ac.uk">heather.simcox@derby-college.ac.uk</a> 07771893898
<b>Deputy Designated Safeguarding Lead</b>	Guy Hodgkinson Safeguarding Team Manager	<a href="mailto:guy.hodgkinson@derby-college.ac.uk">guy.hodgkinson@derby-college.ac.uk</a> 07771893898
<b>Designated Safeguarding Governor/ Trustee</b>	Sue Bradley	Via clerk to the governors <a href="mailto:rose.matthews@derby-college.ac.uk">rose.matthews@derby-college.ac.uk</a>
<b>Designated Teacher for Looked After/ previously Looked After Children</b>	Ashton McCready Student Experience and Pastoral Support Lead	<a href="mailto:ashton.mccready@derby-college.ac.uk">ashton.mccready@derby-college.ac.uk</a>
<b>Senior Lead/s for Mental Health and Well-being</b>	Aaron Denton Vice Principle of Student Experience and Pastoral Support	<a href="mailto:aaron.denton@derby-college.ac.uk">aaron.denton@derby-college.ac.uk</a> 07834788409

#### Other Key Local Safeguarding Contacts

	Derby	Derbyshire
<b>Early Help Advice</b>	<ul style="list-style-type: none"> <li>Derby City <a href="#">Family Hubs</a> and <a href="#">Early Help</a></li> <li>Early Help Advisors, see Safeguarding Children Procedures Contacts, <a href="#">advice and further information</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Family Help Service</a></li> <li>For advice contact Starting Point Consultation and Advice Service for Professionals via 01 629 535353</li> </ul>
<b>Targeted Early Help requests</b>	Locality Vulnerable Children Meeting (VCM) for requests for targeted early help via multi-agency team (MAT) or non-urgent social care referrals via <a href="#">Locality Based Single Point of Access (SPA) Clerks</a>	Requests for support from professionals should be made via the <a href="#">online request for support</a> unless a child is at risk of Significant Harm
<b>Speak to a Social Worker for thresholds advice and consultation</b>	Children's Services Professional Consultation Line 07812 300329	Starting Point Consultation and Advice Service for Professionals 01629 535353
<b>Referrals to Local Authority Children's Social Care</b>	<p><b>Initial Response Team</b></p> <p><b>Urgent:</b> 01332 641172 or out of hours via Careline 01332 956606</p> <p><b>Non urgent:</b> <a href="#">Derby Children's Social Care Online Referral system</a></p>	<p><b>Starting Point</b></p> <p>Urgent: 01629 533 190</p> <p>Non urgent: <a href="#">Starting Point online</a></p>

	Derby	Derbyshire
<b>Local Authority Designated Officer (LADO)</b>	<p>Derby and Derbyshire LADO referral <a href="#">form</a></p> <p><b>Email:</b> <a href="mailto:CPMduty@derby.gov.uk">CPMduty@derby.gov.uk</a></p>	<p>Derby and Derbyshire LADO referral <a href="#">form</a></p> <p><b>Email:</b> <a href="mailto:professional.allegations@derbyshire.gov.uk">professional.allegations@derbyshire.gov.uk</a></p>
<b>Derbyshire Police</b>	<ul style="list-style-type: none"> <li>• 999 for emergencies or 101 for non-emergencies</li> <li>• Mandatory reporting of Female Genital Mutilation (FGM) via 101</li> <li>• Also see <a href="#">When to call the police – guidance for schools and colleges</a></li> </ul>	
<b>Prevent (radicalisation and extremism)</b>	<ul style="list-style-type: none"> <li>• For advice contact the Local Authority Prevent Team:  Derbyshire - 01629 538473 or <a href="mailto:prevent@derbyshire.gov.uk">prevent@derbyshire.gov.uk</a>  Derby - <a href="mailto:Prevent@derby.gov.uk">Prevent@derby.gov.uk</a> or Sally Siner, Prevent Education Officer on 07765 222032 or <a href="mailto:sally.siner@derby.gov.uk">sally.siner@derby.gov.uk</a></li> <li>• <a href="#">Police Prevent (radicalisation/extremism) Team</a> on 101 or directly via 0300 1228694. For emergencies phone 999. See Refer someone to the <a href="#">Derbyshire Prevent Team</a> (Derbyshire Constabulary)  <a href="#">Reporting extremism concerns about an adult working in an education setting</a> submit the details at <a href="#">report extremism in education</a></li> </ul>	
<b>Children absent from education</b>	<ul style="list-style-type: none"> <li>• <a href="#">Derby Education Welfare Service (EWS)</a></li> <li>• <a href="#">Elective home education (EHE)</a></li> <li>• <a href="#">Children missing education (CME)</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Derbyshire Education Welfare Services</a></li> <li>• <a href="#">Elective home education (EHE)</a></li> <li>• <a href="#">Children missing education (CME)</a></li> <li>• See <a href="#">Children missing from education</a> for further</li> </ul>

	Derby	Derbyshire
		information on guidance, policies and procedures relating to school age children missing from education
<b>Virtual School for Looked After Children</b>	<ul style="list-style-type: none"> <li>Virtual School Head - 07812 301044 or <a href="mailto:graeme.ferguson@derby.gov.uk">graeme.ferguson@derby.gov.uk</a></li> </ul>	Helen Moxon, interim virtual school headteacher 01629 538028 <a href="mailto:virtualschool@derbyshire.gov.uk">virtualschool@derbyshire.gov.uk</a>
<b>Emotional Health and Well-being Services</b>	<ul style="list-style-type: none"> <li><a href="#">Emotional Well-Being and Mental Health Services</a></li> <li><a href="#">Derby/South Derbyshire</a></li> <li><a href="#">North Derbyshire</a></li> <li><a href="#">Pathway</a></li> </ul>	
<b>Domestic Abuse</b>	<ul style="list-style-type: none"> <li><a href="#">Safer Derby City</a></li> <li>Derbyshire constabulary - information and advice about domestic abuse <a href="#">webpages</a></li> </ul>	<ul style="list-style-type: none"> <li>Safer Derbyshire domestic abuse <a href="#">webpage</a></li> <li>Derbyshire constabulary - information and advice about domestic abuse <a href="#">webpages</a></li> </ul>
<b>Cyberchoices</b>	For children at risk of being drawn into cybercrime via <a href="#">East Midlands Cyber Secure</a>	
<b>Homelessness or at risk of homelessness</b>	Derby city council homelessness <a href="#">webpages</a>	<i>(See relevant District council website)</i>

## Key National Contacts

Organisation	Description and contact details
<b>NSPCC helpline for adults</b>	<p>Helping adults protect children 24 hours a day. For help and support, including anyone needing advice about female genital mutilation, young people affected by gangs, concerns that someone may be a victim of modern slavery contact the NSPCC trained helpline counsellors on:</p> <ul style="list-style-type: none"> <li>• Text 88858</li> <li>• 0808 800 5000</li> <li>• <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></li> </ul>
<b>NSPCC helpline Report Abuse in Education</b>	<p>Bespoke helpline for children and young people who've experienced abuse at school, and for worried adults and professionals who need support and guidance:</p> <ul style="list-style-type: none"> <li>• 0800 136 663</li> <li>• <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></li> </ul>
<b>NSPCC Whistleblowing Advice</b>	<p>Free advice and support for professionals concerned about how child protection issues are being handled in their organisation:</p> <ul style="list-style-type: none"> <li>• 0800 028 0285</li> <li>• <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></li> </ul>
<b>UK Safer Internet Centre professional advice line</b>	<p>Helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care:</p> <ul style="list-style-type: none"> <li>• 0844 381 4772</li> <li>• <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a></li> </ul>
<b>Police Anti-Terrorist Hot Line number</b>	0800 789 321
<b>National Domestic Abuse Helpline</b>	Hosted by <a href="#">Refuge</a> , Helpline 0808 2000247
<b><u>Operation Encompass</u></b>	Information, resources and elearning for schools
<b>Report harmful online content</b>	<ul style="list-style-type: none"> <li>• UK Safer Internet Centre – <a href="#">report online harm</a>. A national reporting centre that has been designed to assist anyone in reporting harmful content online</li> </ul>

Organisation	Description and contact details
	<ul style="list-style-type: none"> <li>• <a href="#">CEOP</a> – to report online sexual abuse or the way someone has been communicating online</li> <li>• Report <a href="#">online material</a> promoting terrorism or extremism</li> </ul>
<b>Report Abuse in Education helpline</b>	<ul style="list-style-type: none"> <li>• Young people who have experienced abuse at school and parents and teachers who are concerned about sexual abuse in education settings can call the Report Abuse in Education helpline on 0800 136 663 or email <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></li> </ul>
<b>Harmful Sexual Behaviour Support Services</b>	<ul style="list-style-type: none"> <li>• SWGfL Harmful Sexual Behaviour Support Service for the children's workforce 0344 2250623 or email <a href="mailto:hsbsupport@swgfl.org.uk">hsbsupport@swgfl.org.uk</a></li> <li>• <a href="#">Stop it now!</a> For worries about a child's sexual behaviour, 0808 1000 900. Includes <a href="#">Shore</a> which provides a safe and anonymous place for young people to get help and support. The aim is to prevent harmful sexual behaviours among young people.</li> </ul>

## Appendix D

### The seven golden rules to sharing information

1. Remember that the UK General Data Protection Regulation (UK 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 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.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. 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 UK GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
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 (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

*Taken from [Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers \(2018\)](#) HM Government*

