



College Safeguarding Policy and Procedures



SAFEGUARDING POLICY

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COLLEGE SAFEGUARDING POLICY AND PROCEDURES

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QUICK REFERENCE GUIDE

If you require reasonable adjustments to read this document or have any questions about the policy/procedure/guidance, please contact hr@rcpsych.ac.uk

The Safeguarding Policy and Procedures relate to the protection of children, young people, and vulnerable adults.

The Safeguarding Policy (the Policy):

- Explains the scope and purpose of this Policy and who must adhere to it
- Explains the legal framework and the definitions used in this Policy
- Sets out the College's commitments to protect children, young people and vulnerable adults with whom the College comes into contact
- Provides key contact details and lists related policies and procedures

The Safeguarding Procedures set out in detail how the College will seek to prevent harm to children, young people, and vulnerable adults and how to report concerns. The policy specifically relates to how the College will manage safeguarding issues identified through its work. The policy does not cover how to deal with safeguarding issues that might be identified through the clinical work of individual College members. In these cases, College members should use local safeguarding policies.

If you have a concern relating to a child, young person or vulnerable adult, you should take the following steps:

- If the child, young person or vulnerable adult or someone else may be in immediate danger, call the police or ambulance or both
- Discuss your concerns as soon as possible and within 24 hours of the concern arising with the appropriate person as set out below:
 - a) If the College's Designated Safeguarding Lead (DSL) is available and does not have a potential conflict of interest in relation the matter (for example, an allegation is made against them), the safeguarding concern should be reported to the DSL;
 - b) If the DSL is unavailable or has a potential conflict of interest in relation to the matter, the safeguarding concern should be reported to the College Deputy Safeguarding Lead (Deputy) unless the Deputy is also unavailable and / or has a potential conflict of interest in the matter;
 - c) If both the DSL and the Deputy are unavailable and / or have a potential conflict of interest in relation to the matter, the safeguarding concern should be raised with a member of College Senior Management Team (SMT) that is available and does not have any potential conflict of interest in the matter
(contact details below).
- Information should only be shared on a need-to-know basis – you should otherwise keep the information confidential

For more information, see the Safeguarding Procedures below.

Board of Trustee Lead for Safeguarding

Name: Meera Nair

Email: Meera.nair@mft.nhs.uk

Designated Safeguarding Lead (DSL)

Name: Peter Thompson, Director of CCQI

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Deputy Designated Safeguarding Lead (Deputy)

Name: Marcia Cummings, Director of HR

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This policy relates to the protection of children, young people, and vulnerable adults. The College also takes seriously its obligation to protect staff and volunteers from harm.

If anyone has concerns in relation to potential risks or misconduct to employees (which may also constitute safeguarding incidents), they should refer to and carefully follow the following policies:

- Protected Disclosure (Whistleblowing) policy
- Anti-Bullying and Harassment policy
- Grievance procedure
- Disciplinary procedures, and
- Joint Code of Conduct for Officers, Members, Lay People and Employees.

If Patient and Carers have concerns in relation to potential risks or misconduct, they should refer to and carefully follow the following policies:

- Conduct process for Workers
- Complaints process for Workers

Please also refer to page 13 for a list of other related policies and procedures.

Employees and Patients and Carers should speak to HR if they need to urgently raise any concerns that are not safeguarding concerns.

SAFEGUARDING POLICY

INTRODUCTION

The word 'Safeguarding' in the United Kingdom denotes measures to protect the health, well-being, welfare and human rights of individuals, which allow people — including children, young people and vulnerable adults — to live free from abuse, harm and neglect.

Safeguarding is used to define reasonable steps taken to protect individuals from harm and protect their welfare. As the College is an organisation that works closely with vulnerable groups and people with mental illness, intellectual disabilities, and developmental disorders, it is especially important to understand what safeguarding is and why it is important. While safeguarding principally refers to the prevention of harm, it also encompasses practices to handle incidents and/or complaints.

As well as safeguarding vulnerable groups, the College has a duty of care to ensure that no harm comes to those it works with from contact with our staff (employees or workers) or volunteers because of the College's activities. Similarly, the Charity Commission's Guidance *Safeguarding and protecting people for charities and trustees* (updated on 1 June 2022) makes clear that a charity must take reasonable steps to protect from harm all people who come into contact with a charity (i.e. not just vulnerable beneficiaries like children and young people), including people who benefit from the charity's work, staff, volunteers and other people who come into contact with the charity through its work. The College takes seriously its obligations to operate in a way that ensures, so far as is possible, that its work does no harm to anyone with whom it engages. One of the values of the College is Respect. We expect everyone who comes into contact with us to behave respectfully and with courtesy towards everyone. The College also has an obligation to ensure that the organisations it works with have appropriate safeguarding procedures in place. The Safeguarding Policy and Procedures focus specifically on safeguarding children, young people and vulnerable adults. The College's obligations to protect other people who come into contact with the College from harm is dealt with in other policies (for example, the Anti-Bullying and Harassment Policy, the DBS check policy, the Protected Disclosure (Whistleblowing) policy and the Complaints procedure).

Given these values and in light of widely recognised risks, the College is committed to promoting protection for those people with whom it comes into contact and has developed this policy to do so.

Where it comes into contact with vulnerable groups (including children and young people and vulnerable adults), the College ensures it is doing all it reasonably can to protect such groups from all forms of harm, including abuse, neglect and exploitation, and to ensure appropriate action is taken if such harm occurs.

We understand that safeguarding can be a sensitive and complicated issue, and the College will provide support to any member of staff or anyone working on behalf of the College in accordance with the terms of this policy.

This policy should be used to raise concerns that relate to the welfare of a child, young person, or vulnerable adult. Other concerns (which may still amount to safeguarding incidents) should be raised under the College's complaints policy, whistleblowing policy or grievance procedure, as appropriate depending on the nature of the complaint or concern and whom it involves.

Within this policy we use the term 'zero-tolerance' when discussing certain behaviours. When we use this term, we mean we will always address the behaviour appropriately and proportionately, recognising that each situation is unique and must be assessed on its own merits.

The focus is on addressing the impact and nature of the behaviour rather than on the individual, and ensuring that responses are fair, consistent with College values, and supportive where possible.

Challenging unacceptable behaviour helps to:

- Establish clear and respectful boundaries
- Promote accountability for actions
- Discourage behaviours that compromise safety and dignity
- Foster a culture where all individuals feel safe, heard, and valued

Appropriate action will be taken in accordance with best practice, relevant policies, and legal obligations.

PURPOSE AND SCOPE

The purpose of this policy is to ensure that all reasonable steps are taken:

- To protect children, young people and vulnerable adults with whom the College comes into contact through its work
- To set out the College's commitment and approach to safeguarding and promoting the welfare of children, young people and vulnerable adults it encounters

The Safeguarding Policy and Procedures must be adhered to by all employees of the College, on fixed term or permanent contracts, as well as agency workers, patients, carers, volunteers, members, honorary contract holders, consultants, secondees into or out of the College, self-employed contractors, reviewers, trustees and other bodies the College works with (for example, delivery partners or connected charities) and anyone working for or on behalf of the College. All practitioners working with the College who are working with children, young people and vulnerable adults are subject to the same safeguarding responsibilities, whether they are paid or volunteer. Failure to adhere appropriately to the Safeguarding Policy and Procedures will be treated as a very serious matter and may result, in the case of staff, in disciplinary action for gross misconduct or, in the case of contractors, in termination of contract. If you are not working under a contract (for example, you are a volunteer or trustee), a breach of the policy (including falling below the expected standards) may mean that we must ask you to cease being a volunteer or trustee.

The College works with staff, members, clinicians, patients, carers and their organisations as part of its activities.

These activities include, to mention a few:

- Leading the way in developing excellence and promoting best practice in mental health services
- Collaborating with key players in the mental health field and being champions for improvements in the quality of mental healthcare throughout all sectors of society
- Working with mental health services across the UK to assess and improve the quality of care they provide
- Reviewing the evidence and co-producing guidance, standards, workforce competences and quality improvement initiatives to support and enable people to deliver high-quality and equitable mental health care
- Promoting psychiatry as a career

VISION, MISSION STATEMENT AND STRATEGIC PLAN

The College's vision for 2023 - 2025 is to be a strong and progressive College that supports its members to deliver high-quality, person-centered care across the UK, and all over the world.

Our values are:

- Courage
- Innovation
- Respect
- Collaboration
- Learning
- Excellence.

Our mission statement includes working to secure the best outcomes for people with mental illness, intellectual disabilities, and developmental disorders by promoting excellent mental health services.

This means that all our activities should embrace the vision, values, and mission statement of the College. Therefore, we should have in place an effective safeguarding policy and procedure for keeping children, young people, and vulnerable adults safe from abuse, neglect, and exploitation – as well as meeting our duty of care to our staff and volunteers.

LEGAL FRAMEWORK

This policy has been drawn up based on legislation, policy and guidance that seek to protect children, young people, and vulnerable adults in the UK.

Concerns relating to misconduct or service delivery failures that may affect staff or volunteers or members of the public that do not fall within that description should be managed under the complaints procedure, whistleblowing policy or grievance procedures, to which other legal requirements apply.

The key legislation and guidance are:

- Children Act 1989 and 2004
- Working Together to Safeguard Children 2023: statutory guidance (December 2023)
- What to do if you are worried a child is being abused 2015
- Care Act 2014 and the Care and support statutory guidance (updated on 28 March 2024)
- Safeguarding Vulnerable Groups Act 2006
- Safeguarding and protecting people for charities and trustees (updated on 1 June 2022)
- General Data Protection Regulation 2018 as implemented in UK law (UK GDPR) and Data Protection Act 2018
- Equality Act 2010
- Modern Slavery Act 2015
- The policies and procedures of the relevant local authority safeguarding children or adults partnership or board.

In Wales:

- Wales Safeguarding Procedures
- Social Services and Well-being (Wales) Act 2014
- Working together to safeguard people: code of safeguarding practice (January 2022)

In Scotland:

- Protection of Vulnerable Groups (Scotland) Act 2007

In Northern Ireland:

- Safeguarding Vulnerable Groups Act 2006
- Children (Northern Ireland) Order 1995
- Co-operating to Safeguard Children and Young People in Northern Ireland (Version 2.0, August 2017)
- Adult Safeguarding: Prevention and Protection in Partnership (July 2015)

Safeguarding children and young people means protecting them from maltreatment, preventing impairment of their health or development, ensuring that they grow up in circumstances consistent with the provision of safe and effective care and acting to enable all children and young people to have the best outcomes. The welfare of the child is paramount, which means no other considerations should be allowed to override the duty to protect children and young people from harm.

Safeguarding vulnerable adults means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

The Care and support statutory guidance 2016 (updated on 28 March 2024) sets out six key principles which underpin all adult safeguarding work:

Empowerment: People being supported and encouraged to make their own decisions and informed consent

Prevention: It is better to take action before harm occurs

Proportionality: The least intrusive response appropriate to the risk presented

Protection: Support and representation for those in greatest need

Partnership: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse

Accountability: Accountability and transparency in delivering safeguarding.

DEFINITIONS

A child is anyone under the age of 18.

A vulnerable adult is defined as any person who is aged 18 or over and who has needs for care and support (e.g., they may need health or social care services because of learning, physical or mental disability, age or illness. This is the case whether or not the local authority is meeting those needs) and who because of those care and support needs is unable to protect themselves from the risk or experience of harm.

In this policy we refer to 'harm' or 'abuse' to encompass all types of harm and abuse, including neglect and exploitation. See the Safeguarding Procedures for further information.

OUR COMMITMENTS

We believe that:

- Children, young people, and vulnerable adults should never experience harm or abuse of any kind
- We have a responsibility to promote the welfare of all children, young people, and vulnerable adults, to keep them safe and to practice in a way that protects them from all types of harm or abuse
- We owe a legal duty of care to our staff and volunteers.

We recognise that:

- The welfare of children, young people and vulnerable adults is paramount
- All children, young people, and vulnerable adults, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse
- Some children and young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, vulnerable adults, carers and other agencies is essential in promoting their welfare

We will seek to keep children, young people, and vulnerable adults safe by:

- Valuing, listening to and respecting them
- Appointing a nominated Safeguarding Lead (the Senior Associate Director of CCQI), a Deputy Safeguarding Lead (the Director of HR) and a Lead Trustee/Board Member for Safeguarding

- Developing safeguarding policies and procedures which reflect best practice
- Ensuring that all trustees, employees, agency workers, contractors volunteers, and beneficiaries know about safeguarding and people protection (including through training)
- Increasing understanding and raising the awareness of staff and trustees of risks relating to safeguarding within the organisation and in connection with its activities
- Ensuring that all trustees, employees, agency workers, contractors, volunteers, and those that work with the College know how to spot and refer or report concerns
- Using our Safeguarding Procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, vulnerable adults, parents, families, and carers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Creating and maintaining a zero tolerance culture for abuse and exploitation by staff, volunteers, trustees or other bodies the College works with (for example, delivery partners or connected charities)
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Providing effective management for staff and volunteers through supervision, support, training, and quality assurance measures
- Having a code of conduct for staff and volunteers
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Ensuring that we have effective complaints and whistleblowing measures in place
- Setting out risks and how we will manage them in a risk register which is regularly reviewed
- Quickly responding to concerns and carry out appropriate investigations
- Taking appropriate and proportionate action if the College's policy is not complied with
- Ensuring that we provide a safe physical environment for children, young people, vulnerable adults, staff, and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- Maintaining adequate insurance in relation to the College's activities and the people involved, to the extent that it is reasonably available

- Recording and storing information professionally and securely, including ensuring that the College's privacy policy remains suitably updated so that it is clear that, in keeping with our zero tolerance policy, it will report wrongdoing on the part of its trustees, staff and others to appropriate authorities; will share such information as may be necessary to protect individuals from harm; and will provide fair and accurate references, which appropriately reflect the College's experience and interaction with trustees, staff and others
- Publishing the Safeguarding Policy and Procedures and ensuring it is always publicly accessible on our website

We will seek to keep those who come into contact with the College safe by:

- Having appropriate policies and procedures in place, as listed in Related Policies and Procedures below (as noted above, the Safeguarding Policy and Procedures focuses specifically on safeguarding children, young people and vulnerable adults)
- Ensuring those working with the College are able to raise any other concerns via existing policies, for instance on whistleblowing, complaints or dignity at work
- Ensuring the College complies with the Charity Commission's Guidance, [Safeguarding and protecting people for charities and trustees](#) (as updated from time to time)

RELATED POLICIES AND PROCEDURES

This policy statement should be read alongside our organisational policies, procedures and guidance, including:

- Safeguarding Policy and Procedures
- DBS check policy
- Joint Code of Conduct for Officers, Members, Lay People and Employees
- Records Management policy
- Health and safety policy
- Protected Disclosure (Whistleblowing) policy
- Complaints procedure
- Guidance on managing safeguarding concerns when attending peer-review visits
- Equity, Diversity and Inclusion policy
- Information Governance policy.

Information on our privacy notices can be found [here](#).

CONTACT DETAILS

Board of Trustee Lead for Safeguarding

Name: Meera Nair

Email: Meera.nair@mft.nhs.uk

Designated Safeguarding Lead (DSL)

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Deputy Designated Safeguarding Lead (Deputy)

Name: Marcia Cummings, Director of HR

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POLICY REVIEW

We are committed to reviewing our policy and good practice regularly. The Safeguarding Policy and Procedures will be reviewed by the Board of Trustees as necessary (i.e. to reflect changes to statutory requirements, guidance, good practice and current issues or if the College changes the way it works (such as working in a new area or in a different way)), always following a serious incident and at least annually for continuous improvement of the College's approach to safeguarding.

This policy was last reviewed in March 2025.

SAFEGUARDING PROCEDURES

PREVENTION

All those who work with the College should consider potential safeguarding risks when planning their work and activities and should consider how those risks can be mitigated. The College has undertaken risk assessments to inform the Safeguarding Procedures. The College (and, ultimately, the trustees) are responsible for regularly reviewing and updating the risk assessments. In particular:

- Risk assessments should be regularly reviewed and, if necessary, updated to reflect any changes to statutory requirements, guidance, good practice, current issues and any changes in the way the College works (such as working in a new area or in a different way);
- A risk assessment must be completed in advance of any relevant activity or event by a competent person (where there are not current, adequate, and documented risk management procedures already in place).

Risk assessments must be completed by a competent person; that is someone who understands the job, activity or event and is aware of the hazards. The purpose of the risk assessments is to enable the responsible person to identify, mitigate and remove any potential risks relating to contact with children, young people or vulnerable adults. This can also be a prompt to consider alternative working practices, such as minimising occasions where an individual is alone with a child or vulnerable adult and considering whether the activity could be supervised or observed by others.

For events, you should indicate on the event booking form whether attendees may include children, young people or vulnerable adults, and this should be considered during the event planning process.

RECOGNISING THE SIGNS OF HARM/ABUSE

Recognising the occurrence or risk of harm is not easy, and it is not the College's responsibility to decide whether harm has occurred. However, it is the College's responsibility to look out for signs of abuse and act if there are any concerns.

The risks of harm/abuse include (but are not limited to):

- Physical abuse: including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint
- Domestic abuse: This includes psychological, physical, sexual, financial, or emotional abuse (including controlling, coercive or threatening behaviour). It also covers so-called 'honour' based violence. A child is a victim of domestic abuse in their own right if they see, hear or experience the effects of domestic abuse and are related to either victim or perpetrator of the abuse, or either the victim or perpetrator of the abuse has parental responsibility for that child.
- Sexual exploitation and abuse: including rape, indecent assault, inappropriate touching, exposure to pornographic material, abuse of a position of trust, use of sexual language or sexual harassment

- Psychological or emotional abuse: including belittling, name calling, threats of harm, intimidation, isolation, deprivation of contact, humiliation, cyber bullying, unreasonable and unjustified withdrawal of services or supportive networks, coercion
- Financial or material abuse: including stealing, selling assets, fraud, misuse or misappropriation of property, possessions, or benefits, internet scamming or coercion in relation to someone's financial affairs or arrangements (including in connection with wills, property, inheritance or financial transactions)
- Modern slavery: covering slavery, human trafficking and forced labour and domestic servitude. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse, servitude and inhumane treatment
- Neglect and acts of omission: including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs. In the context of safeguarding children, neglect means a 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 (including but not limited to failure to provide adequate food, clothing, shelter, suitable education and access to appropriate medical care or treatment)
- Self-neglect: covering a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding
- Discriminatory abuse: Discrimination on any of the grounds in the Equality Act 2010 including racist, sexist, that based on a person's disability and other forms of harassment, slurs or similar treatment
- Institutional or organisational abuse: including regimented routines and cultures, unsafe practices, lack of person-centered care or treatment. This includes an organisation's culture which may allow poor behaviour and poor accountability. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practise as a result of the structure, policies, processes and practices within an organisation.
- People abusing a position of trust they hold within an organisation
- Extremism and radicalization
- Forced marriage
- Child trafficking
- Female genital mutilation
- Commercial exploitation
- Bullying or harassment.

Abuse may be carried out deliberately or unknowingly. Abuse can be a one-off incident or repeated, on-going ill treatment.

People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, those working with the College, volunteers, or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

It may not always be easy to identify signs of abuse, but the following are some significant ones to be aware of:

- Unexplained bruising or injuries
- Sexually explicit language or behaviour, inappropriate to age or development
- Sudden changes in behaviour e.g., becoming withdrawn or aggressive
- Comments or disclosure by a child, young person, or vulnerable adult
- A noticeable change over a period of time such as weight loss, poor hygiene or unkempt appearance
- Signs of bullying or intimidation
- Change in living conditions or an inability to pay bills / unexplained shortage of money

REPORTING SAFEGUARDING CONCERNS

A safeguarding concern may arise in several ways. For example:

- You may witness abuse taking place
- A child, young person or vulnerable adult may tell you that they have suffered harm
- You may notice behaviour which gives rise to a suspicion that a child, young person, or vulnerable adult has been harmed or is at risk of harm

It is the responsibility of all those who work with the College to report any safeguarding concern to the appropriate person (as set out on page [5] above). Any potential conflict of interest identified by the College in relation to a safeguarding concern (for example, if an allegation is made against an employee of the College) should be recorded by the College. Information relating to the safeguarding concern should not be shared with anyone else in the College or externally before it is reported to the appropriate person.

You **should not investigate** any safeguarding concern yourself, as you may cause further harm. Please report to the appropriate person (as set out on page 5 above) without delay and no later than 24 hours from the point when the concern arises.

If you witness abuse or abuse has just taken place the priorities will be:

- To arrange any medical treatment (note that offences of a sexual nature will require expert advice from the police in order to preserve evidence)
- To call the police if you have witnessed a crime being committed
- If you have not witnessed a crime being committed, but a crime is suspected, and it is not an emergency, you should encourage and support the victim to report the matter to the police
- To preserve evidence
- To keep yourself, other workers, and service users safe
- To inform the appropriate person (as set out on page [5] above) as soon as possible on the same day
- To record what happened on the designated form (Appendix B) and submit it to the appropriate person (as set out on page [5] above) as soon as possible on the same day.

How to respond if a child, young person, or vulnerable adult discloses that they have suffered harm or abuse:

- Reassure the person concerned
- Listen to what they are saying
- Remain calm and do not show shock or disbelief
- Tell them that the information will be treated seriously
- Don't start to investigate or ask detailed or probing questions but establish the basic facts from the child, young person or vulnerable adult's perspective
- Don't promise to keep it a secret – explain who you will need to share the information with and why
- Assess the risk and take steps to ensure the child, young person or vulnerable adult is not in immediate danger
- See the guidance at Appendix A for further information
- Record what you have been told/witnessed as soon as possible on the designated form at Appendix B.

Children may find it difficult to always speak about what they need, what is happening to them or what has happened to them. Legal duties under the Equality Act 2010 must be complied with if someone discloses that they have suffered harm or abuse, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties, unaccompanied children, refugees, those children

who are victims of modern slavery and / or trafficking and those who do not speak English or for whom English is not their first language.

If a child or young person can understand the significance and consequences of the College making a referral to the local authority children's social care, they should be asked their view. However, it should be explained that while their view will be taken into account, the College has a responsibility to take whatever action is required to ensure the child's safety and the safety of other children.

For vulnerable adults (but not children or young people) you should also ask them what they would like to happen and what they would like you to do.

If you have safeguarding concerns about a child or young person, because of something said by an adult, you should not discuss those concerns with the adult.

All situations of abuse or alleged abuse must be discussed with the appropriate person (as set out on page 5 above) on the same day.

Outside the College:

If you are in a hospital, school or prison or any other environment outside College premises in respect of your role with the College, and you witness a vulnerable person being subjected to abuse or a vulnerable person makes a disclosure to you that they are being subjected to abuse in their hospital/ward/prison, please inform staff at the service immediately for them to investigate and take appropriate steps.

You should also inform the appropriate person (as set out on page 5 above) as soon as possible about the concerns and what actions have been taken to report the issue.

If you are travelling to a hospital, school or prison or to any other environment in your role with the College and you encounter a vulnerable person attending the same site, either on public transport or you are staying in the same place and a disclosure is made to you, please inform the appropriate person (as set out on page 5 above).

Next steps

The appropriate person (as set out on page 5 above) who is informed of the safeguarding concern will act in accordance with any policies/procedures of the relevant local authority and will:

- Clarify that the child, young person, or vulnerable adult is safe
- Address any gaps in the information provided to the extent that it is appropriate to do so at that stage
- For children and young people, consider (in discussion with the referrer and, if appropriate or necessary, the child/young person) whether they can understand the significance and consequences of a referral and, if so, that their views have been clearly sought and recorded and that their view is taken into account

- For vulnerable adults (but not children and young people unless required under the above bullet point), check that their views have been clearly sought and recorded and that they are aware what action will be taken and check that issues of consent and mental capacity have been addressed. In the event that a person's wishes are being overridden, check that this is appropriate and that the adult understands why
- Make a referral to the Local Authority Designated Officer (the LADO) or the Adult Social Care team of the relevant local authority (in accordance with any guidance from that local authority) within one working day of being informed of the safeguarding concern and follow any instructions or advice which they give. It may be that the circumstances require that this is undertaken before the actions set out above. The referral should be made in accordance with the relevant local authority's policy and procedures. For the avoidance of doubt, **all** safeguarding concerns with children or adults at risk must be referred to the LADO or the Adult Social Care team as relevant (unless the safeguarding concern arises during a peer-review visit, in which case see *Safeguarding guidance for peer review visits*). Safeguarding concerns with children or adults at risk must be referred to the local authority even if the College has relatively limited information regarding the concern or if the concern has been raised anonymously.
- Liaise with the College's HR department as necessary
- Consider whether and how information needs to be shared with the parent/carer of the child/young person
- Consider whether information needs to be shared with any other member of staff e.g., in some circumstances the DSL/Deputy may need to report to the manager of the team where the concern has arisen
- Make sure action is taken to safeguard other people if appropriate to do so and agreed with the Adult Social Care team/LADO – this may include suspending a member of staff/trustee/volunteer if the allegation relates to them
- If a criminal offence has occurred or may occur, contact the Police force where the crime has/may occur, again in conjunction with advice or guidance from the Adult Social Care team/LADO
- Preserve forensic evidence and consider a referral to specialist services
- Record the information received and all actions and decisions
- Consider whether any referral needs to be made to the Disclosure and Barring Service (DBS) (or Disclosure Scotland or Access NI, as the context requires) and keep this under review. This will be required, for example, if the College removes an individual (paid worker or unpaid worker) from work with an adult with care and support needs (or would have, had the person not left first) because the person poses a risk of harm to adults.
- Report to the trustees (in an anonymised or pseudonomised format, if the

context requires), so that they can consider whether a Serious Incident Report to the Charity Commission for England and Wales and/or the Scottish Charity Regulator (OSCR) is required

- If the safeguarding concern arises in an external organisation that the College works with, follow the *Safeguarding guidance for peer review visits*.

Disclosures to external agencies must be undertaken in accordance with the requirements of the UK GDPR and Data Protection Act 2018, as well as the ICO's Data Sharing Code of Practice. It is noted that these requirements are not a barrier to the sharing of information, but a framework within which to do so.

Please bear in mind that for vulnerable adults (but not children and young people), decisions need to consider all relevant information that is available, including the views of the adult in all circumstances where it is possible and safe to seek their views. If the adult does not want to pursue matters through safeguarding action, decision-makers should be sure that the adult is fully aware of the consequences of their decisions, and that all options have been explored and that not proceeding further is consistent with legal duties.

There may be some occasions when the vulnerable adult does not want to pursue a referral to the local authority. Where it is a personal matter and may cause family disharmony, if possible, the vulnerable adult's wishes should be respected and other ways of ensuring the adult's safety explored. Where there is a potentially high-risk situation, decision-makers should be vigilant of possible coercion and the emotional or psychological impact that the abuse may have had on the adult. Decisionmakers also need to take account of whether there is a public or vital interest to refer the concern to the local authority.

Where there is a risk to other adults, children or young people or there is a public interest to take action because a criminal offence has occurred, may occur or persist and the view is that it is a safeguarding matter, the wishes of the individual may be overridden. Where the sharing of information to prevent harm is necessary, lack of consent to information sharing can also be overridden.

In the event that people lack the capacity to provide consent, action should be taken in line with the Mental Capacity Act 2005. Where an adult is found to lack capacity to make a decision then any action taken, or any decision made for, or on their behalf, must be made in their best interests.

The DSL or Deputy may take advice (unless they have a potential conflict of interest in the matter, in which case the appropriate member of SMT may take advice) at the above stage from the relevant Adult Social Care team or LADO and/or other advice-giving organisations such as Police.

Decisions to make a referral to the local authority and what information is shared and on what basis should be appropriately recorded.

Allegations made against any person working for the College (including trustees, patients and carers)

An allegation may relate to a person who works with children, young people or vulnerable adults and has:

- Behaved in a way that has harmed or may have harmed a child, young person or vulnerable adult;
- Possibly committed a criminal offence against or related to a child, young person or vulnerable adult;
- Behaved towards a child, young person or vulnerable adult in a way that indicates they may pose a risk to such groups; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, young people or vulnerable adults.

An allegation of this kind is distinct from a concern about the quality of care or practice of that person or a complaint about that person.

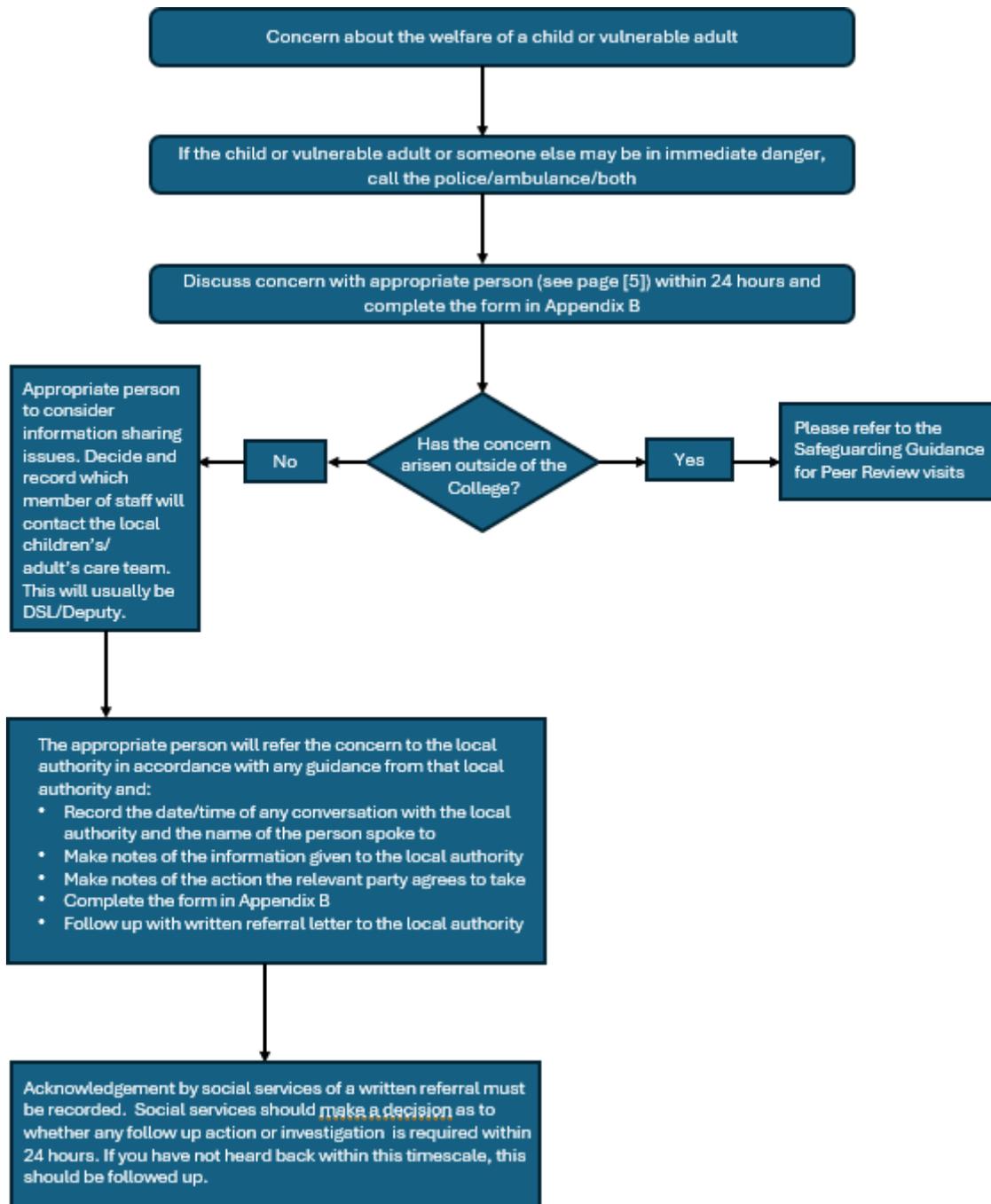
Any allegation against people working for the College (including trustees, patients and carers) who work with children, young people or vulnerable adults should be immediately reported to the appropriate person (as set out on page 5 above).

The College will ensure that any allegations relating to the welfare of a child, young person or vulnerable adult made against those working for the College are dealt with swiftly. The College will inform the Adult Social Care team / LADO (as relevant) within one working day of all such allegations that come to the attention of an appropriate person at the College (as set out on page 5 above). Where it is suspected that a criminal offence has been committed, the police will be informed. If a criminal offence has been witnessed, the police should be contacted immediately.

The safety of the individual(s) concerned is paramount. A risk assessment must be undertaken immediately by the DSL or Deputy (unless they have a potential conflict of interest in the matter, in which case the risk assessment will be undertaken by an appropriate member of SMT) to assess the level of risk to all patients/service users, staff and volunteers posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the College whilst the investigation is undertaken.

The DSL or Deputy will liaise with the Adult Social Care team / LADO (unless they have a potential conflict of interest in the matter, in which case an appropriate member of SMT will liaise with the Adult Social Care team or LADO) to discuss the best course of action and to ensure that the College's disciplinary procedures are coordinated with any other enquiries taking place as part of the ongoing management of the allegation.

SAFEGUARDING CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS FLOWCHART



College DSL

Peter Thompson, Director CCQI
Tel: 020 8618 4057

Deputy DSL

Marcia Cummings,
Director of HR
Tel: 020 8618 4103

Trustee Lead for Safeguarding

Meera Nair

SUPPORT FOLLOWING A SAFEGUARDING INCIDENT

The College, through the HR department, provides support when there has been a safeguarding incident within or outside the College and it has a direct impact on staff members working closely to the 'incident'. The following support is available to the staff member or team:

1. Access to College's Employee Assistance Programme (EAP) service.
2. Access to the College's end-to-end mental health support for staff.
3. Access to Reflective Practice with an expert.
4. Safeguarding training (refresher training where necessary).

In some specific cases, a counsellor can be provided to provide on-site support to individual staff members or teams.

If a staff member or team requires more tailored support following the incident, this will be provided by HR.

INFORMATION SHARING AND GDPR

The College is committed to maintaining confidentiality and acting in accordance with applicable data protection legislation.

It is important that all staff involved in a safeguarding incident ensure that **information is shared only on a 'need to know' basis**, in accordance with the Policy and Procedures. Information relating to the incident should be recorded on the designated form at Appendix B and provided to the appropriate person (as set out on page 5 above). Forms will be kept in a locked filing cabinet, and / or a secure computer or server and access will be restricted to the DSL and Deputy (or the relevant SMT member if relevant). The matter must not otherwise be discussed, without the permission of the DSL or Deputy (or the relevant SMT member if relevant).

ROLES AND RESPONSIBILITIES IN SAFEGUARDING

Those working with the College have a responsibility:

- To understand the Safeguarding Policy and Procedures and to follow them
- To immediately inform the appropriate person (as set out on page 5 above) of any potential safeguarding issue, and no one else unless permission is given to do so
- To keep a written record of the safeguarding issue, stating the date and time
- To ensure that information is kept confidential and only shared on a 'need to know' basis
- To follow the Code of Safe Conduct at Appendix C

- To have received training before going to sites (e.g., hospital, school or prison) or any other environment outside the College premises

DSL or Deputy (or, where relevant, the Appropriate Person as set out on page 5 above) have a responsibility to:

- To ensure that the Safeguarding Policy and Procedures are followed
- To report to external agencies including, as necessary, the police, DBS and local authority. All safeguarding concerns with children or adults at risk should be referred to the LADO or adult team at the relevant local authority within one working day of the appropriate person (as set out on page 5) being informed of the concern. The relevant staff member at the college should not assess whether the concern is, for example, “serious” enough or “substantiated” enough to be referred; **all** concerns with children or adults at risk must be referred to the LADO or adult team at the relevant local authority (unless the safeguarding concern arises during a peer-review visit, in which case see *Safeguarding guidance for peer review visits*).
- To monitor the overall trend of any safeguarding concerns and report annually (or more frequently, as appropriate) to the Trustees (who have ultimate responsibility for safeguarding)
- To keep a log of safeguarding issues
- To ensure the person reporting the incident is well supported and looked after
- To inform the Director of HR or any other designated HR staff of the safeguarding incident
- To liaise with HR if any other tailored support can be provided
- To liaise with relevant stakeholders as necessary e.g., it may be necessary to inform the media team if the safeguarding incident may attract media attention
- To advise where the safeguarding issue has implications in respect of contracts to which the College is party
- To seek external advice, where reasonably necessary or appropriate
- To ensure that information is kept confidential and only shared on a ‘need to know’ basis
- To ensure risk assessments are regularly reviewed and updated and competent individuals carry out further risk assessments for any relevant activities or events (where there are not current, adequate and documented risk management procedures already in place)
- To ensure appropriate due diligence is carried out when the College works with any other bodies (for example, delivery partners or connected charities), including ensuring they have appropriate safeguarding procedures in place and ensuring there are clear lines of responsibility and reporting between the College and such other bodies

- To ensure that other bodies that the College works with know that any safeguarding breaches may result in termination of their relationship with the College (and that the relevant contractual agreements give the College the power to do this)
- If the College is made aware of a safeguarding concern arising in an external organisation that the College works with, to follow the procedure in the *Safeguarding Guidance for peer review visits*.

HR Department have a responsibility to:

- To provide support to the person raising the concern and any other staff involved
- To prepare, update and keep under review the Safeguarding Policy and Procedures in conjunction with the College SMT
- To ensure that the Safeguarding Policy and Procedures are accessible in appropriate formats to staff, volunteers, and stakeholders
- To organise safeguarding awareness training for staff, volunteers, trustees and any other relevant people and regularly evaluate this training to ensure it is current and relevant
- To organise onsite support to staff/teams when required
- To organise DBS checks and renewals for relevant staff, patients/service-users and volunteers
- To update DBS policy and relevant managers/staff about new legislative changes to DBS
- To ensure that information is kept confidential and only shared on a 'need to know' basis

The Board of Trustees:

- Have ultimate responsibility for safeguarding
- Will review the Safeguarding Policy and Procedures as necessary (i.e. to reflect changes to statutory requirements, guidance, good practice and current issues or if the College changes the way it works (such as working in a new area or in a different way)), always following a serious incident and at least annually for continuous improvement of the College's approach to safeguarding.

SAFER RECRUITMENT

The College is committed to safer recruitment. Trustees will risk assess all roles taking into account the working environment to determine if they are eligible for a Disclosure and Barring Service (DBS) criminal records check and, if not, have a risk assessment process in place for roles which do not qualify for a DBS check. When recruiting staff members, volunteers or trustees, the College will: carry out the highest level of DBS or other criminal record check to which it is entitled, request two written references, consider gaps in work history, check qualification

and certifications and, where appropriate, confirm a person's right to work in the UK and / or require a health check.

Staff[, trustees] and volunteers of the College are not automatically subject to a criminal record check. The College employs a framework to determine whether it is proportionate and relevant to undertake a check for a role. The level of the relevant check will depend on the nature of the activity being carried out by the staff member/volunteer and, in some cases, the site where the relevant activity is performed.

For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a criminal record check certificate will be submitted in the event of the individual being offered the position.

The work of the College Centre for Quality Improvement (CCQI) involves regular visits to sites outside College premises, e.g. hospital wards, HM Prisons, Community Health Centres, etc. Because of the activities which CCQI staff/volunteers variously undertake, and the locations where they undertake them, some CCQI roles will always require a criminal record check, and we always make the criminal record checking requirement clear when advertising these roles. The Invited Review Service (IRS) also visits mental health services and because of this, IRS roles involving contact with children, young people and vulnerable adults will always require a check.

We will also require members of the SMT and other relevant staff to undertake a DBS check, where they are eligible for a standard or enhanced check. If they are not eligible for a standard or enhanced check but it is reasonable to anticipate that they will come into contact with children, young people and/or vulnerable adults in settings, they may be asked to obtain a basic check.

Please see the DBS check policy for more information.

PHOTOGRAPHY AND IMAGE SHARING GUIDANCE

There are very limited circumstances in which the College would take and/or publish photographs of children, young people, and vulnerable adults.

Please speak to the Strategic Communications Team in advance if you intend to take any photographs or videos of children, young people, or vulnerable adults, for example at an event. In those circumstances, the following principles must be followed:

- Adults, whether vulnerable or not, have a right to decide whether their images are taken and how these may be used. To the extent that an adult does not have capacity to make this decision, a carer should do so on their behalf
- Children and young people and their parents/carers have a right to decide whether their images are taken and how these may be used
- We will always ask for written consent from a child or young person and their parents or carers before taking and using a child or young person's image and do likewise in relation to any vulnerable adults. This consent must state how long the image(s) will be stored for as well as for what purpose(s). A copy of the written consent must be stored in the same place as the image; and a copy of the written consent must be sent to the Strategic Communications Team. Information on our privacy notices can be found [here](#).
- Care must be taken to ensure that images are not sexual or exploitative in

nature, nor open to obvious misinterpretation and misuse

- All images of children, young people and vulnerable adults will be securely stored and in the case of images used on websites, particular care will be taken to ensure that no identifying details facilitate contact with a child, young person or vulnerable adult by a potential abuser
- If the College uses external photographers they will be advised of our safeguarding and other pertinent policies and will sign to acknowledge that they have read, understand, and will abide by them
- If spectators or visitors are intending to photograph or video at an event/activity, they must be told of our expectations and wherever possible written notices to this effect will be displayed. Any concerns regarding inappropriate or intrusive photography/filming should be reported to the event/activity manager/coordinator immediately and dealt with in the same manner as any other safeguarding concern.

ONLINE SAFETY

The College does not work directly with, or provide services directly to, children, young people, and vulnerable adults.

Operating online carries specific safeguarding risks connected to protecting people from abuse and protecting sensitive information. The Code of Safe Conduct includes clear directions to those who work with the College on how to behave online.

A risk assessment must be completed in advance of any online activities by a competent person (where there are not current, adequate, and documented risk management procedures already in place for such activity).

If a meeting online does include children, young people, or vulnerable adults, you should ensure the following:

- The meeting is conducted in an appropriate location (i.e., not in a public space where confidential information might be disclosed)
- Attendees are dressed appropriately
- There is no offensive material in the background.

Through working online, you may become aware of a safeguarding issue or concern, and this should be reported following the procedures set out above.

If online abuse occurs, we will respond to it by:

- Following our Safeguarding Policy and Procedures, which applies to online abuse in the same way as it applies to any other kind of abuse
- Providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse, and sexual exploitation
- Making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation into account
- Updating our plan for addressing online safety if we need to.

EMBEDDING ORGANISATIONAL COMMITMENT

To make its policy commitments a practical reality, the College will instigate or strengthen a range of measures that focus on making sure the Safeguarding Policy and Procedures are in place, that people are supported to understand and work within the provisions of the policy, that it is fully and effectively integrated into all activities, and that it is subject to monitoring and review.

All those working with the College will be expected to acknowledge and accept their responsibilities under the Policy and Procedures and the Code of Safe Conduct. Breaches by employees, agency workers, patients/service-users, carers, members, other bodies the College works with (for example, delivery partners or connected charities) and volunteers will be treated seriously and will be treated as a potential cause for disciplinary action or termination of the relationship by other means. Breaches by Trustees may result in the termination of their Trusteeship.

MANDATORY SAFEGUARDING TRAINING

The College is committed to ensuring that all staff and workers receive appropriate levels of Safeguarding training to allow them to safely carry out their roles.

Staff and workers therefore must complete the College's online mandatory Safeguarding training. All individuals must complete this mandatory course within one month of commencing with the College. Failure to complete required training within the specified timeframes may lead to further formal action until completion is attained.

Those who work with the College (including patients, carers and trustees) will also receive regular training/briefing on their responsibilities and obligations under the Policy and Procedures [and on child protection and working with adults at risk] and it will form part of their induction.

For those individuals who are unable to complete the online mandatory course and associated questionnaire, a separate PDF version of the content is available. In such circumstances as well as reading the material, individuals must undergo a risk assessment to assess the risks associated with their engagement with the College and confirm the types of activities which they could engage in.

LESSONS LEARNT REVIEWS

Following the reporting of any safeguarding concern within the College, the Safeguarding Leads will review the incident to identify any lessons learnt that suggest additional actions need to be taken to reduce future risk. The lessons learnt review may also involve other people who work for the College in the area relating to the concern.

Any actions identified will be reported to the College SMT and implementation will be overseen by the Safeguarding Leads.

REVIEW AND CONTINUOUS IMPROVEMENT

The College is determined to keep learning from all experiences and is always seeking to improve on its own performance, as stated in our values. The College will monitor its performance on safeguarding and protecting people from harm.

This policy will be reviewed by the Board of Trustees as necessary (i.e. to reflect changes to statutory requirements, guidance, good practice and current issues or if the College changes the way it works (such as working in a new area or in a different way)), always following a serious incident and at least annually for continuous improvement of the College's approach to safeguarding.

APPENDIX A: GUIDANCE WHEN DEALING WITH A DISCLOSURE

If a child, young person or vulnerable adult discloses that they have been abused in some way, the employee/volunteer/worker should:

- Immediately stop what they are doing and listen to what is being said
- Don't display shock or disbelief
- Accept what is being said
- Allow the child, young person or vulnerable adult to talk freely
- Reassure the child, young person or vulnerable adult, but do not make promises which it might not be possible to keep – in particular, you cannot promise confidentiality
- Reassure them that what has happened is not their fault
- Stress that it was the right thing to tell
- Listen, rather than ask direct questions
- Not criticise the alleged perpetrator
- Explain what must be done next and who has to be told
- Make a written record as soon as you can
- Pass information to the Appropriate Person (as set out on page 5 of the Safeguarding Policy and Procedures)
- NOT allow the child, young person or vulnerable adult to be interviewed a second time. Accept what they say and report to the Appropriate Person (as set out on page 5 of the Safeguarding Policy and Procedures).

General Points:

- Show acceptance/belief of what the child, young person or vulnerable adult says (however unlikely the story may sound)
- Keep calm
- Look at the child, young person or vulnerable adult directly
- Tell the child, young person or vulnerable adult you will need to let someone else know – don't promise confidentiality
- Even when a child, young person or vulnerable adult has broken a rule

they are not to blame for the abuse

- Be aware that the child, young person, or vulnerable adult may have been threatened or bribed not to tell
- Never push for information. If the child, young person, or vulnerable adult decides not to tell you, then accept that and let them know you are always ready to listen and respond immediately. Even partial disclosures should be referred to the Appropriate Person (as set out on page 5 of the Safeguarding Policy and Procedures).

Helpful things you may say or show:

- I believe you (or showing acceptance of what the child, young person or vulnerable adult says)
- Thank you for telling me
- It's not your fault
- I will help you.

Things not to say:

- "Why didn't you tell anyone before?"
- "I can't believe it"
- "Are you sure this is true?"
- "Why? How? When? Who? Where?"
- Never make false promises
- Never make statements such as "I am shocked" or "don't tell anyone else".

Concluding:

- Reassure the child, young person, or vulnerable adult that they were right to tell you and show acceptance
- Let the child, young person or vulnerable adult know what you are going to do next and that you will let them know what happens (you might have to consider referring to the Police)
- Contact the Appropriate Person (as set out on page 5 of the Safeguarding Policy and Procedures) as soon as possible
- Consider your own feelings and seek appropriate pastoral support if needed **whilst maintaining confidentiality**

Follow Up:

- Make notes as soon as possible (preferably within one hour of being told), writing down exactly what the child, young person or vulnerable adult said and when, what you said in reply and what was happening immediately beforehand (e.g. description of activity)
- Record dates and times of these events and when you made the record. Keep all notes securely (including hand-written notes, even if these have been typed subsequently)
- Report to the Appropriate Person (as set out on page 5 of the Safeguarding Policy and Procedures) as soon as possible and within 24 hours of the disclosure
- You must not discuss your suspicions, allegations, or any disclosure with anyone other than those named in the Safeguarding Policy and Procedures, without the knowledge and consent of the DSL or their Deputy (or, where relevant, the Appropriate Person, as set out on page 5 of the Safeguarding Policy and Procedures)

APPENDIX B: REFERRAL FORM FOR SAFEGUARDING

This form must be completed as soon as possible after witnessing abuse, receiving information that causes suspicion or an allegation of the abuse of a child, young person, or vulnerable adult. This must be discussed with the Appropriate Person (as set out on page 5 of the Safeguarding Policy and Procedures). Do not delay by attempting to obtain information to complete the details.

Note: Confidentiality must be maintained at all times. Information must only be shared on a need to know basis, i.e. only if it will protect the child, young person or vulnerable adult. Do not discuss this incident with anyone other than those who need to know. Ensure that this form is kept securely and confidentially if in hard copy format or electronically. If it is stored electronically, ensure it is password protected.

Continue on a separate sheet of paper if required and attach securely to this form.

Details of person making this report:

Name:
Position:
Contact telephone number:

Details of child or vulnerable adult:

Name:
Date of birth:
Address:
Contact telephone number:
Names and address of child's parents/guardian OR vulnerable adult's carers/children (if relevant):

Details of person about whom there is concern:

Name:
Position:
Date of Birth:
Address:
Relationship to child/vulnerable adult:

If you are reporting this alleged incident on behalf of someone else, please provide details of that person:

Name:
Position:
Address:
Contact telephone number:

Date this person advised you of alleged incident:
Record here the information you were given from this person about the alleged incident:

Details of alleged incident:

Date of alleged incident:
Time:
Place:
Name and addresses of witnesses:

Describe in detail what happened:

Describe in detail visible injuries/bruises and concerning behaviour of the child or vulnerable adult, if any (use diagrams if this helps you to describe):

Was the child/vulnerable adult asked what happened: **YES/NO**

If YES, record exactly what the child/vulnerable adult said in their own words and any questions asked if the situation needed clarification:

Did you assess the risk and take steps to ensure the child/vulnerable adult is not in immediate danger: **YES/NO**

Please provide details:

THIS SECTION IS FOR CHILDREN AND YOUNG PEOPLE ONLY AND DOES NOT APPLY TO VULNERABLE ADULTS

Can the child or young person understand the significance and consequences of the College making a referral to the local authority children's social care: **YES/NO**

If YES, have they been asked their view: **YES/NO**

If YES, record exactly what the child/young person said in their own words and any questions asked if the situation required clarification

Did you explain that while their view will be taken into account, the College has a responsibility to take whatever action is required to ensure the child's safety

and the safety of other children: **YES/NO**

THIS SECTION IS FOR VULNERABLE ADULTS ONLY AND DOES NOT APPLY TO CHILDREN

Was the vulnerable adult asked what they would like to happen and what they would like you to do: **YES/NO**

If YES, record exactly what the vulnerable adult said in their own words and any questions asked if the situation needed clarification:

Did you explain to the vulnerable adult who you will need to share the information with and why: **YES/NO**

Please provide details:

Did the vulnerable adult give their consent to information being disclosed to the local authority: **YES/NO**

Please provide details:

If there are grounds to override consent to share information, did you explain what these are: **YES/NO**

Please provide details:

Did you explain how the adult will be involved and kept informed: **YES/NO**

Please provide details:

Did you provide information and advice on keeping safe and the safeguarding process:
YES/NO

Please provide details:

Does the person have capacity under the Mental Capacity Act 2005: **YES/NO**

Please provide details:

Details of action taken:

Detail what action, if any, has been taken following receipt of this information (for example, if you have contacted the police or other emergency services, please provide details):

Signature _____

Print name: _____

Date: _____

FOR COMPLETION BY THE DSL, DEPUTY OR, WHERE RELEVANT, A MEMBER OF THE COLLEGE SENIOR MANAGEMENT TEAM ONLY

Details of action taken:

Detail what action, if any, has been taken following receipt of this information:

ONLY AFTER SEEKING ADVICE FROM THE POLICE/LADO/LOCAL ADULT SOCIAL CARE OFFICE were the child's parent(s)/guardian OR vulnerable adult's carer(s) contacted?

Details of external agencies contacted:

Police	Police Station contacted: Name and contact number: Advice received:
Local Adult Social Care/ LADO	Local authority: Name and contact number: Advice received:
Other	Name of organisation: Name and contact number: Advice received:

Other information

Signature _____

Print name: _____

Date: _____

Where a referral has been made to the Police/Local Adult Social Care office/LADO a copy of this form must be sent to them as soon as possible.

APPENDIX C: CODE OF SAFE CONDUCT

The College's Joint Code of Conduct for Officers, Members, Lay People, Employees and Workers applies in all cases.

In addition, when interacting with children, young people and/or vulnerable adults, all those who work with the Royal College of Psychiatrists agree to maintain professionalism and respect in their conversations and conduct at all times (including online) and agree to never:

- Physically or verbally assault or abuse children, young people and/or vulnerable adults in any way
- Develop relationships with children, young people and/or vulnerable adults that could be deemed emotionally exploitative or abusive, or act in ways intended to shame, threaten, humiliate, belittle, coerce or otherwise emotionally harm or manipulate children, young people and/or vulnerable adults
- Develop physical or sexual relationships with children, young people and/or vulnerable adults or behave in a manner which is inappropriate or sexually provocative
- Invite a child, young person and/or vulnerable adult to your home, share personal contact details with them or communicate with them via social media or other online messaging sites
- Act in ways that may place children, young people and/or vulnerable adults at risk of abuse from others
- Use language, make suggestions or offer advice, which is inappropriate, or offensive to children, young people and/or vulnerable adults
- Do things for children, young people and/or vulnerable adults of a personal nature that they can do for themselves
- Condone or participate in behaviour of children, young people and/or vulnerable adults which is illegal, unsafe, or abusive
- Discriminate against or show differential treatment or favour particular children, young people and/or vulnerable adults to the exclusion of others.

You should never have one-to-one contact with a child, young person, or vulnerable adult out of public view and should avoid being in any situation where this may arise. In circumstances where it is necessary to have one-to-one contact, find a place which is appropriate (e.g. use a room with windows, leave the door open) and let another team member know where you are, with whom and what you are doing.

You should also avoid any unnecessary physical contact with children, young people and/or vulnerable adults.

Failure to adhere appropriately to the Code of Safe Conduct will be treated as a very serious matter and may result, in the case of staff, in disciplinary action for

gross misconduct or, in the case of contractors, in termination of contract. If you are not working under a contract (for example, you are a volunteer or trustee), a breach of the policy (including falling below the expected standards) may mean that we must ask you to cease being a volunteer or trustee.

APPENDIX D: GOLDEN RULES OF INFORMATION SHARING

The College adopts the seven golden rules for information sharing as set out in the Department for Education's *Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers* (updated in May 2024), as set out below. The College highlights that information must be forwarded in the first instance to the Appropriate Person (as set out on page 5 of the Safeguarding Policy and Procedures), who (together with members of the SMT and Board of Trustees) will ensure that the processes and procedures adopted in any given matter adhere to these principles:

1. Protecting a child from harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.
2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why. You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).
3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm. You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.
4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case. Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, seek advice from the DSL or Deputy if you are unsure.
5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.
6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need

to support the provision of their services. Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information. When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

Information on our privacy notices can be found [here](#).