



# Confetti Child Protection and Safeguarding Policy

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## Key Purpose and Objectives

Confetti has a statutory and moral duty to ensure that it functions with a view to safeguarding and promoting the welfare of young people receiving education and training at Confetti.

This Policy outlines Confetti's procedures for dealing with the protection of children, young people and adults at risk of harm (formerly 'vulnerable adults').

It clarifies roles and responsibilities within the organisation and the processes which should be followed to safeguard all learners.

The policy covers all Confetti sites and students, including the London campus.

The Nottinghamshire Safeguarding Children Partnership (NSCP) have produced Child Protection Interagency Procedures and Practice Guidelines which Confetti will adopt and will be accessed for advice and guidance.

## Key Responsibilities

The Chief Executive Officer (CEO) is ultimately responsible for safeguarding issues and compliance, alongside the Chief Operating Officer (COO).

The designated senior member of staff with lead responsibility for safeguarding is the Student Services Manager.

The **HR Lead** is responsible for the safe recruitment of staff managing the process for allegations against a member of staff and the completion and recording of training.

**Other staff with specific responsibility are detailed in the policy.**

## Policy and Legislative Connections

- The Children Act 1989 places a duty on Local Authorities to take steps to protect children and gives certain powers to the Police so that they may take action to protect children.
- Working Together to Safeguard Children September 2023
- Nottinghamshire Safeguarding Children Partnership (NSCP) and Nottingham City Safeguarding Children Partnership (NCSCP) Interagency Safeguarding Children Procedures
- Keeping Children Safe in Education September 2024

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# 1 Overview

## 1.1 Scope

The Children Act 1989 defines a **child** as “a person under the age of 18”. This could therefore include:

- Any student up to the age of 18;
- Any other person under the age of 18 who becomes known to Confetti, including visitors and staff (which may include external client bookings).

Where reference is made within this policy, to children and young people, this term is used to mean those under the age of 18. Any concerns will be raised to the Local Authority Children’s Social Care.

An ‘adult at risk of harm’ (formerly ‘vulnerable adult’) is a person of 18 years of age or older who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is, or may be, unable to take care of themselves, or be unable to protect him or herself against significant harm or exploitation.

An adult at risk of harm may therefore be someone who, for example:

- Is an older person who is frail due to ill health, physical disability or cognitive impairment;
- Has a learning disability, a physical disability and/or a sensory impairment;
- Has mental health needs including dementia or a personality disorder;
- Has a long-term illness/condition;
- Misuses substances or alcohol;
- Is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse;
- Lacks the mental capacity to make particular decisions and is in need of care and support.

## 1.2 Key Principles

Children, young people and adults at risk of harm have a fundamental right to be protected from harm. The protection of children and adults at risk of harm is a shared community responsibility. The abuse of children and adults at risk of harm is a clear infringement of human rights and in many cases may be a criminal offence.

Confetti is committed to ensuring that it:

- Creates a positive and safe environment;
- Actively safeguards and promotes the welfare of students, following robust procedures;
- Identifies children, young people and adults at risk of harm who are suffering, or likely to suffer, significant harm;
- Takes appropriate action to see that such children, young people and adults at risk of harm are kept safe, both at home and at Confetti;
- Provides well-trained and well-supported staff to deliver safeguarding provision;
- Adopts an attitude of ‘it could happen here’.

All staff will receive training adequate to familiarise them with safeguarding issues and responsibilities as well as Confetti procedures and policies, with further updates every year. There will be a senior member of staff with lead responsibility for safeguarding. There will also be identified deputies. These persons will undertake specific high level safeguarding training every 2 years as recommended by the Nottinghamshire Safeguarding Children Partnership (NSCP). The Safeguarding Leads will be nominated to liaise with the Local Authority and relevant partners on issues of safeguarding and the **HR Lead**, CEO or COO in the event of allegations of abuse made against one of the Safeguarding Leads.

A Safeguarding and Prevent Steering Group and Working Group will oversee the safeguarding agenda and safeguarding will feed into a number of other meetings and working groups.

## 2 Responsibility for Actions within the Policy

### 2.1 Designated Safeguarding Lead

The designated senior member of staff (DSL) with lead responsibility for safeguarding is the Student Services Manager. They have a key duty to take lead responsibility for raising awareness with staff of issues relating to the welfare of children, young people and adults 'at risk', and the promotion of a safe environment for all students learning at Confetti and is also the Looked After Children (LAC) designate for care experienced students.

The DSL will receive training at least every two years along with training in safeguarding issues and inter-agency working, as required by the Local Safeguarding Partnership. The DSL will also attend the local DSL network to ensure that practices and knowledge are kept up to date with the current local climate and links are created with peers. The DSL will receive peer support and supervision from an external party.

Responsibilities of the DSL includes:

- Overseeing the referral of cases of suspected abuse or allegations to Social Care Services.
- Overseeing the referral of cases to 'Channel' where there is a concern of radicalisation.
- Providing advice and support to other staff on issues relating to child and adult safeguarding.
- Ensuring a record of any child and adult protection referrals, complaints or concerns (even where that concern does not lead to a referral) is maintained.
- Ensuring that parents/carers of children and young people within Confetti have access to the Safeguarding Policy.
- Liaising with the Nottinghamshire Safeguarding Children Partnership (NSCP, formally NCSCB) or relevant Local Authority and other appropriate agencies, including Tower Hamlets MASH.
- Oversee staff acting as a contact point for young people who are 'looked after' or who are 'leaving care'.
- Lead responsibility for E-Safety and advising on the Filtering and Monitoring systems and processes.
- Ensuring that a member of the safeguarding team is available during timetabled hours in term time and out of hours where requested, including for trips and visits.
- Supporting HR to ensure that all staff receive basic training in safeguarding issues and are aware of Confetti's safeguarding procedures.
- Updating HR when there is a change in policy or requirements locally or nationally.
- Undertaking regular audits of safeguarding procedures.
- Ensuring (alongside HR) that a DSL is onsite or contactable during all times the setting is open to under 18's.
- Reporting deficiencies in procedure or policy identified by the NSCP (or others) to the CEO and/or the COO at the earliest opportunity.
- Convene a monthly review group meeting for all Designated Staff to discuss current cases and to review any applications that pose a safeguarding risk.
- Review Safeguarding Risk Assessments where required.
- Where needed, they may also decline offers for students who pose a safeguarding risk.
- Lead the liaison between Social Care Services and HR in connection with allegations against staff. This will include undertaking or supporting the investigation with HR.
- Lead on Safeguarding audits from partners and the local authority.
- Oversee the completion and monitoring of the Single Central Record and report on completion to the Safeguarding & Prevent Steering Group.

### 2.2 Deputy Safeguarding Lead

The Deputy Safeguarding Lead is the Deputy Student Services Manager. The Deputy DSL will support the DSL in carrying out their safeguarding role. Some responsibilities may be delegated to the Deputy DSL but the DSL will remain ultimately responsible.

The Deputy DSL will undertake DSL training every two years along with training in safeguarding issues and inter-agency working, as required by the NSCP. The deputy will also receive peer support and supervision from an external party.

In addition to supporting the responsibilities outlined in 2.1, the deputy will also:

- Refer cases and support DSO's to refer to social care or other relevant agencies.
- Liaise with the manager(s) responsible for secondary schools which send pupils to Confetti to ensure that appropriate arrangements are made for their pupils.
- Undertake Safeguarding Risk Assessments where required.
- Ensure all cases are recorded timely and accurately.
- Provide advice and support to DSO's and other staff in the absence of the DSL.

## 2.3 Designated Safeguarding Officers

Confetti has four further Designated Staff: the Mental Health and Safeguarding Officer, the Student Wellbeing and Safeguarding Officer, the London Student Services Manager (who will lead on situations in London) and the Head of Student Services, who can specialise in cases of students with additional needs.

All designated staff will undertake DSL training every two years along with training in safeguarding issues and inter-agency working, as required by the NSCP and the Tower Hamlets Safeguarding Adults Board. All staff dealing with disclosures will receive Peer Support and attend the Safeguarding Review Group meetings. The Mental Health and Safeguarding Officer and the Student Wellbeing and Safeguarding Officer will also receive peer support and supervision from an external party.

The Head of Student Services will also have oversight of Safeguarding via the Governance Structure (Appendix 6).

They are all expected, when needed, to support all responsibilities outlined in 2.1 and 2.2.

## 2.4 Other Staff Members

All staff, regardless of role, have a responsibility to safeguard our students. There are some key roles/teams however that have a remit to pick up and deal with wider safeguarding issues presented by students/staff.

These are:

- Student Welfare Officers

These staff will:

- Pass on any concerns to the DSL, Deputy or DSO's;
- Know how to make an appropriate referral;
- Be available to provide advice and support to other staff on issues relating to child and adult safeguarding;
- Have a responsibility to be available to listen to students who have concerns;
- Deal with individual cases, including attending case conferences and review meetings as appropriate;
- Receive training in wider safeguarding issues.

For students with Additional Needs who may need advocacy/ support, a member of the Access and Inclusion Team will be assigned.

In addition to this there are also Safeguarding First Responders in place. These staff have all had DSL training and are able to triage and refer cases in the absence of the Designated Safeguarding staff.

## 2.5 The Chief Operating Officer

The Chief Operating Officer is responsible for liaising with the Education Leadership Team, Directors and the senior staff members with lead responsibility over matters regarding child protection, including:

- Ensuring that Confetti has adopted the Interagency Procedures produced by the Nottinghamshire Safeguarding Children Partnership and the Safeguarding Adult's Board;
- Ensuring that the senior staff consider and approve the Confetti Child Protection and Safeguarding Policy each year;
- Ensuring that each year the senior staff are informed of how Confetti and its staff have complied with the policy, including a report on the training that staff have undertaken;
- Ensuring there are procedures for reporting and dealing with allegations of abuse against members of staff;
- The safe recruitment of staff;
- Overseeing the liaison between Social Care Services and HR in connection with allegations against the Senior Staff Member with Lead Responsibility. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries. For allegations against the COO, the CEO will assume this responsibility.

## 2.6 Human Resources

The **HR lead** has responsibility for

- Ensuring that appropriate training has taken place for all staff and is made available for volunteers, including recording that all staff have read Part one of Keeping Children Safe in Education.
- Ensuring that there are safe recruitment policies and practices, including enhanced Disclosure and Barring Service (DBS) checks on staff who have regular, unsupervised access to children up to age 18 and adults at risk of harm and where appropriate, for governors and volunteers.
- **Ensuring the maintenance of employee data for the Single Central Record and reporting quarterly to the DSL.**
- Ensuring that contractors are not allowed unsupervised access if no checks have been obtained.
- Ensuring that there is record of all DBS checks undertaken on staff and where appropriate, governors and volunteers.
- Ensuring that there is a robust procedure for responding to concerns and allegations of abuse regarding employees who work with children and young people, including a clear and robust 'whistle-blowing' policy.
- Manage the process of allegations against staff alongside the DSL and external agencies (where required).

The above responsibilities may be delegated to the HR Manager, where appropriate, but the **HR Lead** maintains responsibility.

## 2.7 The Work Placement Co-ordinator

The Work Placement Co-ordinator (WPC) will take responsibility for students that are out on placement with support and advice from the DSL. The WPC will liaise with employers regarding any concerns and will report them to the safeguarding team.

The WPC will also take responsibility for ensuring any DBS checks are carried out (where needed) and any self-disclosure forms with employers.

The WPC will ensure that employers are aware of their safeguarding responsibilities and will report any concerns to the DSL. The WPC will also ensure that all employers receive the safeguarding expectations document.

### 3 Types of Abuse

#### 3.1 Children and Young People under 18

Confetti recognises the following as definitions of abuse and neglect as defined within *Keeping Children Safe in Education*:

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Abuse may also occur if a child sees, hears or experiences it towards others (e.g. in the case of Domestic Abuse).

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and **all** staff should be aware of it and of their school or college's policy and procedures for dealing with it.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In addition, *Keeping Children Safe in Education* identifies that there are wider safeguarding issues that we need to consider and act upon. Some of these include:

**Child Sexual Exploitation  
Domestic Violence**

**Bullying including Cyberbullying (3.5)  
Drugs and Alcohol Misuse**



**Child on Child Abuse (3.4)**  
**Female Genital Mutilation (FGM) (see 3.2)**  
**Gangs and Youth Violence**  
**Preventing Radicalisation (see 3.3)**  
**Sexting and e-safety**  
**Children Missing Education**  
**Trafficking**  
**Missing Children and Adults**  
**Contextual Safeguarding**

**Fabricated or Induced Illness**  
**Forced Marriage**  
**Mental Health**  
**Child Criminal and Sexual Exploitation (See 3.7)**  
**Sexual Harassment and Sexual Violence (see 3.6)**  
**Children Missing from Home or Care**  
**Hate Crime**  
**Serious Violence**  
**Suicidal ideation/Attempts**

### **3.2 Female Genital Mutilation**

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Confetti recognises that it now has a statutory duty, to report to the police any discovery that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Any suspected cases of FGM should be reported to one of Confetti's Designated Safeguarding Staff who will involve the Police and Social Care as appropriate.

### **3.3 Preventing Radicalisation**

Protecting individuals from the risk of radicalisation should be seen as part of Confetti's wider safeguarding duties, and is similar in nature to protecting individuals from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. As with managing other safeguarding risks, staff should be alert to changes in an individual's behaviour which could indicate that they may be in need of help or protection. Staff should use their professional judgement in identifying individuals who might be at risk of radicalisation and refer any concerns to one of Confetti's Designated Safeguarding Leads or Officers.

Confetti recognises that it has a statutory duty to have 'due regard to the need to prevent people from being drawn into terrorism. In complying with the duty, Confetti commits to demonstrating an awareness and understanding of the risk of radicalisation and extremism in their institution. Confetti has produced an action plan that considers levels of risk in the key areas as outlined by the Department of Education.

Prevent at Confetti, falls under the banner of safeguarding and will be led by the Student Services Manager who is also the Designated Safeguarding Lead. If any staff have any concerns relating to students and radicalisation, they should refer them to one of Confetti's Designated Safeguarding Staff. Confetti's Designated Safeguarding Staff will then work with external agencies such as Channel or the regions local Prevent Co-ordinator if appropriate.

Confetti has a monitoring system to flag concerns, 'Impero' is used to monitor IT use across Confetti.

Confetti also has a process for vetting external speakers and charities to protect young people from exposure to radicalisation.

### **3.4 Child on Child Abuse**

Child on Child abuse is a specific form of abuse that is a particularly challenging and complex area of safeguarding. Staff should recognise that students are capable of abusing their peers and inappropriate behaviour should not be tolerated or dismissed as 'banter'.

Child on Child abuse should be reported as a safeguarding issue and referred to the disciplinary process.

Child on Child abuse can take many forms. It **can** happen both inside and outside of Confetti and online. **It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.**

This **can** include (but is not limited to):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse within intimate partner relationships;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment (see 3.6);
- consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting and initiation/hazing type violence and rituals.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

### 3.5 e-Safety and Cyberbullying

With the increasing use of technology, there is a rise in safeguarding concerns coming from the 'online' world.

This includes:

- Cyber bullying
- Online fraud
- Grooming

Confetti has online blocking and monitoring in place and a team of staff who are responsible for e-Safety. Lessons are delivered to support e-Safety as well as pertinent messages being delivered via various student communication mechanisms.

### 3.6 Sexual Harassment and Sexual Violence

Sexual violence and sexual harassment can occur between two children or young people of **any age and sex**. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Staff dealing with reports of Sexual Harassment and Sexual Violence will follow the guidance in Part Five of Keeping Children Safe in Education and will support the victim throughout the process.

### 3.7 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child in to take part in sexual or criminal activity. Usually this is in exchange for something that the victim needs or wants such as financial gain or increased status, or is achieved through the threat of violence.

### 3.8 Adults at Risk of Harm

Chapter 14 within the Care Act 2014 details requirements for the Safeguarding of Adults.

The Safeguarding duties within the Care Act apply to an adult who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or at risk of, abuse or neglect;
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

## 4 Information Sharing and Confidentiality

### 4.1 Sharing Information

Information sharing is vital to safeguarding and promoting the welfare of children, young people and adults at risk.

Where there are concerns about the safety of a child, young person or an adult at risk of harm, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst UKGDPR places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child, young person or an adult at risk being placed at risk of harm.

Staff should use their judgement when making decisions on what information to share and when. A flowchart on when and how to share information is available in Appendix 2. If any member of staff is in doubt, they should contact one of the Designated Safeguarding Leads or Officers.

### 4.2 The principles of sharing information.

The Data Protection Act 2018 and UKGDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Confetti adopts the 'seven golden rules to sharing information' as outlined in the HM Government document '*Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers*'. Information should not be shared before consulting a safeguarding lead, except in emergency situations. Full details on when and what to share can be found here; <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

## 5 Dealing with Disclosures of Abuse and Reporting Concerns

### 5.1 Disclosures

If a member of staff suspects or receives information, or an individual discloses that they are at risk of harm or abuse may be occurring, they have a responsibility to refer to one of the Designated Safeguarding Staff. The safety and welfare of the individual is the primary objective and a member of staff should not delay in seeking medical help in an emergency situation or in contacting other staff to assist if immediate protection is needed.

The member of staff should contact the Safeguarding team by calling 07752 729566, emailing [safeguarding@confetti.ac.uk](mailto:safeguarding@confetti.ac.uk) or speaking directly to one of the team.

Members of staff should be aware that their duty to refer such suspicions or allegations overrides the concept of confidentiality and this should be explained to the student in a manner best suited to the individual student. Help to communicate with Students with Learning Difficulties / Disabilities will be sought from the Head of Student Services, if needed.

### 5.2 Procedure for referral

Any allegation, disclosure or suspicion of abuse needs to be taken seriously and handled in a sensitive manner. Individual members of staff should never deal with disclosures in isolation, and **should always refer to a Designated Safeguarding Person**, who will undertake the interview. Information should be strictly limited to those who need to know.

However, as outlined in Part One of Keeping Children Safe in Education **‘Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately.’**

Staff should **ALWAYS** make it clear to a young person that they cannot make guarantees of confidentiality. If possible, they should warn the individual about this **before** they are given an opportunity to disclose.

If the young person does not wish to continue:

- Encourage them to access support services within Confetti;
- State that you may have to pass on any disclosure

If the young person wishes to continue:

- Listen carefully to what is being said;
- Keep questions to a minimum, just to clarify what is being said;
- Avoid leading questions, prompting or making comments;
- Suspend your own judgement and remember that you are not investigating the matter;
- Staff should support the student and give reassurances whilst explaining which other people will need to know about the allegations;
- Inform the young person of the actions that will follow your conversation and assure them that they will be kept informed of all developments;
- Staff should make notes of the conversations which may be needed by the investigating agency (e.g. Social Services)
- Where possible, staff should include the following:
  - Names of those present during the disclosure/allegation
  - Address and contact of young person
  - Date of birth
  - Other agencies already involved
  - Date and time of the conversation
  - Place where the alleged abuse happened
  - Brief description of the allegation
  - Any visible injuries
  - Any alleged injuries
  - Young person’s preferred action
  - Means of contacting the young person
  - Next steps and follow up agreed

Staff should contact one of the Designated Safeguarding Staff immediately after the initial disclosure and pass all information to them. The Designated Safeguarding person who receives the information will make a decision with the DSL about who to contact, usually Social Care and / or the Police. They will also log the information within CPOMS. Students should be advised that we may need to inform parents/carers of any referral that is made, provided that this doesn’t pose any additional risk.

Appendix 2 provides a flowchart that details how to deal with concerns, suspicions or disclosures of harm or abuse.

### 5.3 Designated Staff Duties

If the student wants to take the allegation forward themselves, the Designated Person should support the student in contacting Social Care Services, and ensure that is made within 24 hours of initial disclosure/allegation. (The police may be contacted if the student is in immediate danger of harm to self or others).

If the Designated Person decides that they must report the allegation, the Designated Person should contact Social Services by telephone and complete any additional paperwork within 24 hours of the initial disclosure/allegation, if requested. If a Designated Person is unsure whether to make a referral, they should contact the **NSCP Safeguarding Consultation Line for advice 0115 8764800** or, for London, the Tower Hamlets Safeguarding Adults Board 0300 303 6070.

The student and referring staff member should be informed of the action being taken and the reasons for this decision. This should happen before Social Care Services are informed, unless doing so would place the person at greater risk. In this case, both staff and student should be contacted as soon as safety considerations of the person permit.

The parents/carer for a child, young person or adult at risk of harm should also be informed of the action being taken, unless doing so would place the person at greater risk.

**The Designated Safeguarding Person should contact Social Care Services by telephone or by completing the relevant online referral. The date and time of the contact should be recorded.**

Where any proceedings follow the initial referral, the DSP should provide relevant feedback to the student as recommended by Social Services.

The Designated Person should ensure that all written records relating to the incident are kept indefinitely, in a secure location. The DSP is responsible for ensure that cases are fully recorded and updated. All cases should remain on review until concluded. If a suitable intervention is not received from Social Care, the DSL should support the DSP to escalate the concerns with social care – team manager, service manager, head of service, director of safeguarding, Safeguarding Children’s Partnership chair.

Designated staff should, at all times, keep the DSL up to date on proceedings.

### 5.4 Procedure for post-18’s

It is **not** a legal requirement to inform statutory agencies of abuse cases involving students over 18 years old who aren’t deemed to be adults at risk of harm. However, if someone at Confetti is over 18 and disclose information regarding anyone under 18 who they may be associated with, e.g. their own children, siblings, other family members, then you must report this to one of the Designated Safeguarding Staff.

A duty of care is maintained for students over 18 and support/referrals will be offered.

## **6 Reporting and Dealing with Allegations of Abuse against Members of Staff**

### **6.1 Introduction**

In rare instances, staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. Confetti recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

Confetti recognises that the Children's Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within Confetti will do so with sensitivity and will act in a careful, measured way.

The HR Lead will ensure that any 'low level' concerns are recorded so that they can be reviewed and considered against the Confetti Code of Conduct if/when needed.

### **6.3 Receiving an Allegation from a Child, Young Person 16-18 or Adult at Risk of Harm**

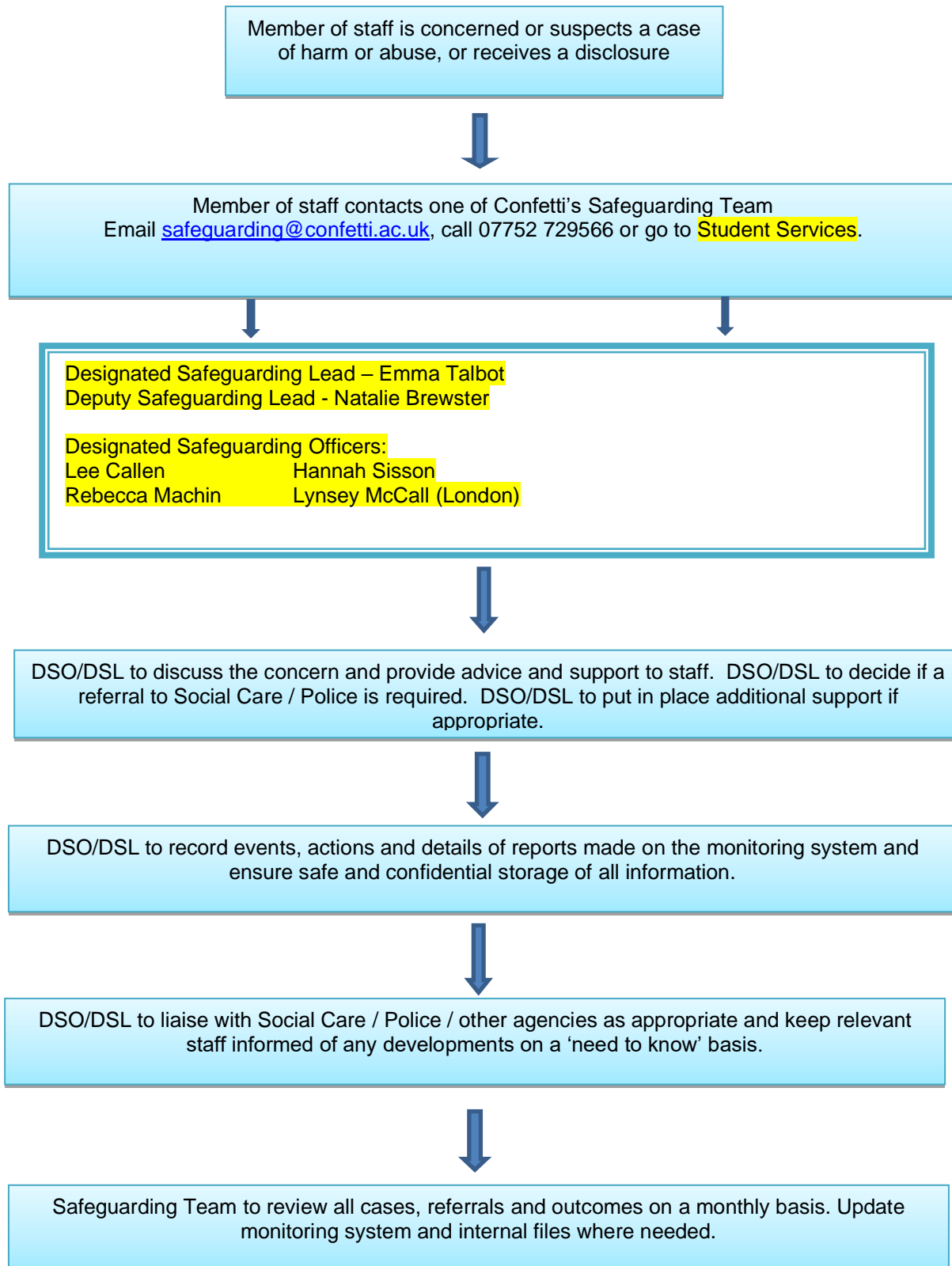
A member of staff who receives an allegation about another member of staff from a child/young person should follow the guidelines in Section 3 for dealing with disclosure.

The **Procedure for dealing with allegations of abuse against members of staff** (see Appendix 4) should be followed.

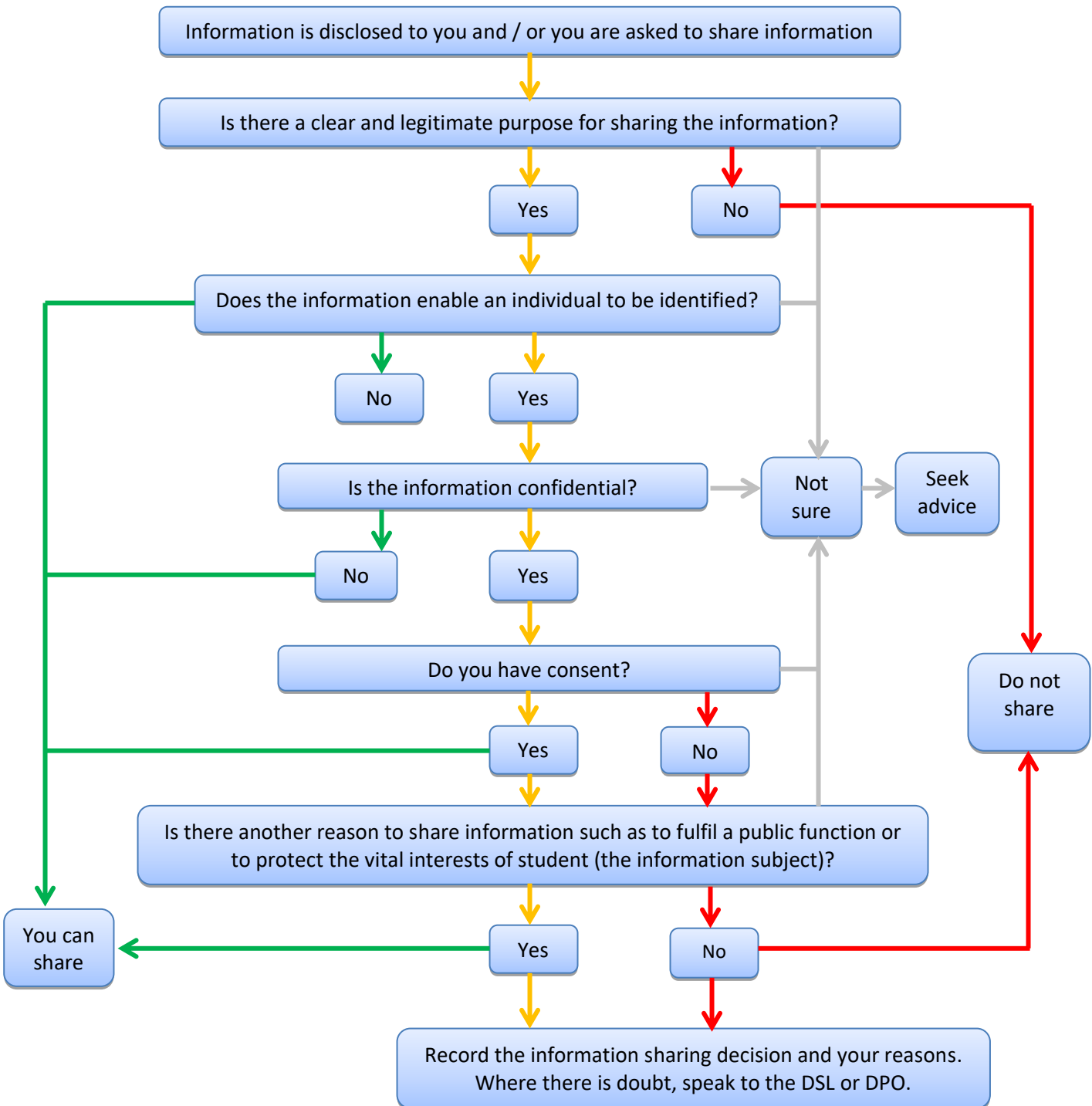
Allegations may be received via the complaints process, the DSL will lead on the complaint with HR.

## Appendix 1

### Flowchart for dealing with concerns, suspicions or disclosures of harm or abuse



## Appendix 2 Flowchart of when and how to share information



### When sharing information:

- Identify how much to share
- Distinguish fact from opinion
- Ensure you are giving the right individual to the right information
- Ensure where possible, you are sharing the information securely
- Inform the individual that the information has been shared if they were not aware as long as this would not create or increase risk of harm.

If there are concerns that a child, young person or adult at risk of harm is suffering or likely to suffer harm, then follow Confetti's relevant safeguarding procedures. If you are unsure about what to do at any point, please seek advice from one of Confetti's Safeguarding Team.



## Appendix 3

### For use by the Safeguarding Team

#### NOTTINGHAM CITY

Children's Social Care	Adult Social Care
<b>Within office Hours: (Mon - Thurs 8.30a.m. - 5.00 p.m. Fri 8.30am – 4.30pm) - 0115 876 4800</b>	<b>Office hours: Monday – Thursday 8.30am to 5.00pm, Friday 8.30am to 4.30pm</b> 0300 131 0300
<b>Outside Office Hours:</b> Emergency Duty Team: 0115 876 5600	<b>Outside Office Hours:</b> 0115 876 1000

#### NOTTINGHAMSHIRE

Children's Social Care	Adult Social Care
<b>Monday – Thursday 8.30am to 5.00pm, Friday 8.30am to 4.30pm</b>	<b>Monday – Thursday 8.30am to 5.00pm, Friday 8.30am to 4.30pm</b>
Multi-agency Safeguarding Hub (MASH) – 0300 500 80 90	Customer Service Centre – 0300 500 8080
<b>Out of office hours - Emergency Duty Team:</b> 0300 456 4546	<b>Out of office hours:</b> Emergency duty team: 0300 456 4546

#### DERBY CITY

Children's Social Care	Adult Social Care
<b>Monday – Friday 9.00am to 5.00pm</b>	<b>Monday – Friday 9.00am to 5.00pm</b>
Social Care Services – 01332 641172	Social Care Services – 01332 642855
<b>Outside Office Hours:</b> Careline: 01332 956606	<b>Outside Office Hours:</b> Careline: 01332 956606

#### DERBYSHIRE

Children's Social Care	Adult Social Care
01629 533190	01629 533190

#### LEICESTER CITY

Children's Social Care	Adult Social Care
0116 454 1004	0116 255 1606

#### LEICESTERSHIRE

Children's Social Care	Adult Social Care
0116 305 0005	0116 305 0004

#### TOWER HAMLETS

Children's Social Care	Adult Social Care
<b>Monday – Friday 9.00am to 5.00pm</b>	0300 303 6070
020 7364 5006	
<b>Outside Office Hours:</b> 020 7364 4079	

## Appendix 4

### Dealing with Allegations Against Staff

#### 1. Action to be taken pre-employment

Where a candidate has applied to volunteer or for work and appears on the Disclosure and Barring Service (DBS) barred list, or there are serious concerns about an applicant's suitability to work with Children and Adults at Risk, Confetti has a duty to notify the DBS.

Referral information is found at point 4.

#### 2. Action to be taken in employment

##### 2.1 Responding to an allegation of abuse against a staff member

Where allegations indicate that an employee may be unsuitable to continue to work with Children or an Adult at Risk of Harm in either their present position or any capacity as they may have:

- Behaved in way that has harmed a child or an adult at risk of harm or may have harmed a child or an adult at risk of harm.
- Possibly committed a criminal offence against or related to a child or an adult at risk of harm.
- Behaved toward a child, children or an adult(s) at risk in a way that indicates that they may pose a risk of harm to them.

Note:

1. The concept of 'harm' may have occurred in either a personal or professional capacity.

The following action must be taken:

The allegation must be raised with the HR Lead and the Student Services Manager, or where they are the subject of the allegation, the Chief Operating Officer should be contacted.

In the case of allegations made by someone over the age of 18, the Student Services Manager and another qualified independent manager, will assess whether the student is considered an adult at risk of harm and will inform the HR Lead as part of the investigation process.

The HR Lead and Student Services Manager will then, with support from suitably experienced and senior Confetti personnel, immediately discuss the allegation with the Local Authority Designated Officer(s).

The purpose of this discussion is to consider the nature, content and context of the allegation and agree a course of action. This could include a decision that no further action is to be taken. In these cases this decision and a justification for it will be recorded and Confetti, together with the Local Authority Designated Officer, will agree what information should be put in writing to the individual concerned and by whom.

The Local Authority Designated Officer is always contacted before any action is taken in respect of a staff member unless there is an immediate risk to others or evidence of a criminal offence when the police may be contacted.

Confetti will act on the advice of the Local Authority Designated Officer.

In Nottingham and London, the Designated Officer role is undertaken by the following people:

Name	Role	Contact Details
<b>Eve Hailwood</b>	Principal Manager - LADO (Nottingham City)	0115 8764148 <a href="mailto:Evelyn.hailwood@nottinghamcity.gov.uk">Evelyn.hailwood@nottinghamcity.gov.uk</a>
<b>Caroline Hose</b>	LADO (Nottingham City)	0115 8764148 <a href="mailto:caroline.hose@nottinghamcity.gov.uk">caroline.hose@nottinghamcity.gov.uk</a>
<b>Hazel McKibbin</b>	Service Manager and LADO (NSCP)	0115 9773921
<b>Karen Shead</b>	Safeguarding Co-ordinator	0115 8764725 <a href="mailto:karen.shead@nottinghamcity.gov.uk">karen.shead@nottinghamcity.gov.uk</a>
<b>Claire Maclean</b>	Schools and Education Safeguarding Co-ordinator (NSCP Nottingham City)	0115 8762042 <a href="mailto:Claire.Maclean@nottinghamcity.gov.uk">Claire.Maclean@nottinghamcity.gov.uk</a>
<b>LADO Referrals</b>		0115 8764762 <a href="mailto:lado@nottinghamcity.gov.uk">lado@nottinghamcity.gov.uk</a>
Name	Role	Contact Details
<b>Melanie Benzie</b>	LADO (Tower Hamlets)	<a href="mailto:LADO@towerhamlets.gov.uk">LADO@towerhamlets.gov.uk</a>

Having obtained advice from the Student Services Manager, Confetti HR and the staff member's line manager will usually inform the employee about the allegations.

The employee will be provided with as much information as possible, however where a strategy discussion is required, or other services need to be involved, Confetti may not be able to disclose information until all agencies have agreed what can be disclosed.

Where allegations indicate that another person is or has been at risk of harm, or the allegation warrants investigation by the police / social services, or where the alleged act may constitute serious or gross misconduct, the employee should be suspended on full pay for good and urgent cause. Other reasonable alternatives will be considered prior to suspension.

Details on suspension arrangements are found within the staff disciplinary policy. The member of staff is suspended to enable an investigation to be carried out and it does not infer that any conclusions have been reached about the validity of the allegation.

If immediate suspension is considered necessary, the rationale and course of action should be agreed with the Student Services Manager. This should also include what alternatives to suspension were considered and why they were rejected.

An investigation will then be carried out following the process outlined in the staff disciplinary policy. It does not automatically follow that the outcome is a disciplinary penalty, but this policy provides the framework for the process to be followed.

The HR Manager will assume responsibility under the direction of the HR Lead for the investigation into the allegations and ensuring that the process is adhering to the guidelines contained in the document 'Keeping Children Safe in Education 2021'. The HR Lead will ensure that the employee is kept up to date at all times.

**The Student Services Manager will assume responsibility for ensuring that parents and carers of those 'at risk' involved in the allegation are kept informed upon the advice of the Local Authority Designated Officer.**

If an employee tenders their resignation in response to an allegation, a full investigation will still be undertaken. Every effort should be made to fully investigate the allegation and come to a conclusion, even if the employee refuses to co-operate with the process. Where this is the case it should be noted.

Settlement agreements will never be used in situations where an allegation of this nature has been received.

### **3. Action to be taken to report misconduct post employment**

Where Confetti has ceased to employ someone engaged in Regulated Activity because they were considered unsuitable to work with children or adults at risk (Safeguarding reasons) a referral will be made to the Disclosure and Barring Service promptly and within 1 month of the employment ending. This includes situations where the employee would have been dismissed had they not resigned.

Details of the information required for a referral is found on the forms below.

Historical allegations against a member of staff who is no longer employed will be referred to the Police.

### **4. Referral information**

Referrals should be made to:

Disclosure and Barring Service  
PO Box 181  
Darlington  
DL1 9FA

### **5. General Principles**

Confetti recognises that it has a duty of care to employees and as such will provide support for anyone facing an allegation. Should suspension be required they will be provided with a named contact within Confetti.

All efforts will be made to deal with allegations of abuse as quickly, fairly and consistently as possible and in a way that complies with procedural requirements, the effective protection of the child or adult at risk of harm and at the same time supports the employee who is the subject of the allegation.

### **6. Record keeping**

Details of allegations which have been found to be malicious will be removed from the employee's record.

For all other allegations Keeping Children Safe in Education requires that a clear and comprehensive summary of the allegation, the details of how the allegation was followed up and resolved, a note of action taken and decisions reached shall be kept on the employee's confidential file with a copy provided to the person concerned.

These records will be retained until either the person has reached the age of 65 or a period of 10 years from the date of the allegation (whichever is longer). This is necessary should any further allegations arise in the future.

### **7. Employment references**

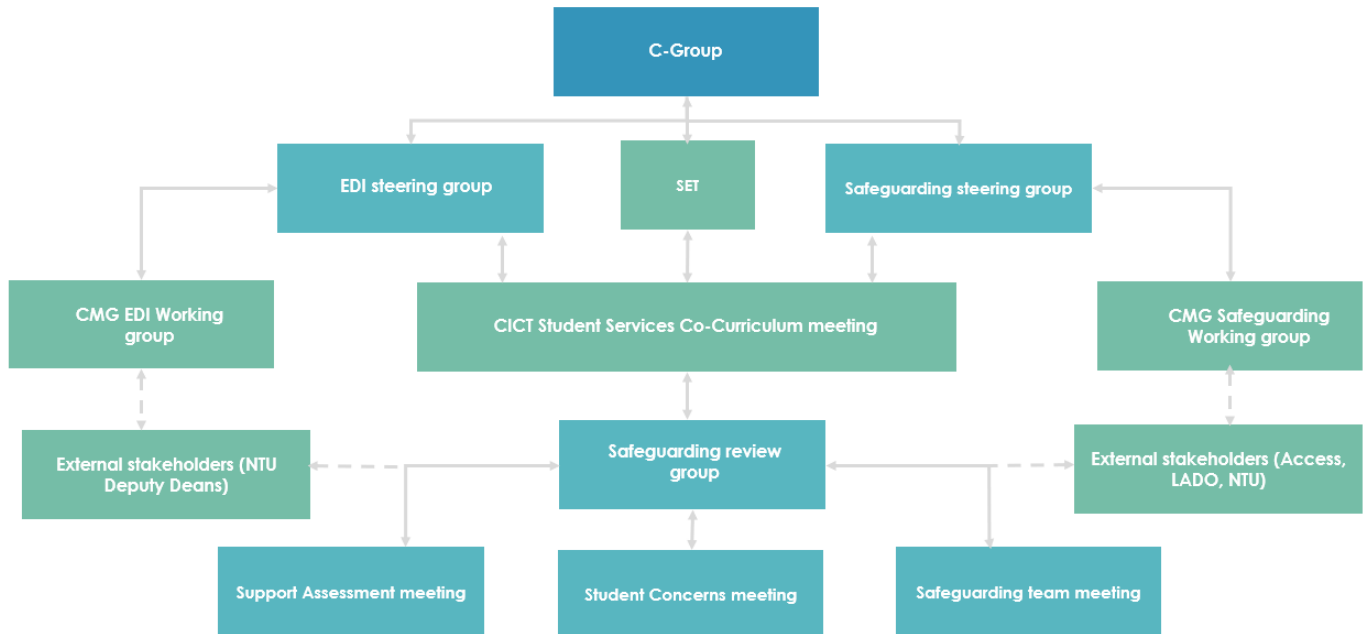
Cases in which an allegation was proven to be false, malicious or unsubstantiated will not be included in an employment reference, regardless of the allegation being a one-off or there being a history of such allegations.

## Appendix 5

### Safeguarding Governance Structure

# Student Services governance

Equality, diversity and inclusion. Safeguarding and prevent



EDI, Safeguarding and Prevent reporting structure							
Meeting	Support Assessment	Student Concerns	Safeguarding Review Group	Student Services Co-Curr meeting	CMG Working Group	CMG Steering Group	C-Group SET/CASCQ
EDI	Weekly planning	Weekly inclusion review	N/A	Termly operational meeting	Quarterly operational meeting	6-weekly strategy meeting	Quarterly report
Safeguarding and Prevent	Weekly planning	Weekly welfare review	Monthly review		Quarterly operational meeting	6-weekly strategy meeting	Quarterly report