

Volunteer Police Cadet (VPC) Safeguarding

Policy & Procedure

Greater Manchester Police

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1. Policy Statement

All children, young people and vulnerable adults have the right to be protected. Greater Manchester Police (GMP) strives to ensure that everyone involved in our Volunteer Police Cadets (VPC) Scheme are safeguarded and protected from harm, whatever their specific needs and circumstances. GMP acknowledges its responsibility to safeguard and promote the wellbeing of all children, young people and adult volunteers/employees.

We are committed to ensuring our safeguarding practices, procedures and policies place the voice of our cadets at the centre of our planning and implementation processes. We will at all times prioritise the wellbeing of our cadets, other young people and where required, vulnerable adults in all we do and are committed to ensuring all our activities and engagement within the wider community is held to the highest standards of safeguarding practice; is compliant with current legislation in England and Wales; is child and young person centred; and that we are fully accountable.

This policy outlines how to recognise the signs and indicators of possible safeguarding issues to ensure that staff and Police Support Volunteers recognise the significance of what they are observing, and the procedures that they need to follow if they have a concern. The procedures outlined in this policy apply to all elements of VPC activity, including weekly cadet sessions, any offsite trips and any residential or overnight activities. Whilst every attempt has been made to cover a wide range of situations, it is recognised that this guidance cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by their employer. It is expected that in these circumstances, employees/volunteers will always advise their Line Manager or Lead Safeguarding Officer of the justification for any such action already taken or proposed.

1.1 Aims

The purpose of this policy is:

- to ensure that all staff, Police Support Volunteers, Governance Board members and external agencies, including partners delivering on behalf of GMP, are aware of their legal and personal responsibilities to ensure the safeguarding and welfare of children and young people;
- to set out how GMP seeks to ensure the safeguarding of all staff, Police Support Volunteers and Governance Board members involved in the VPC;
- to create a culture where the welfare and wellbeing of everyone involved in the VPC Scheme is paramount.

2. Scope

This policy applies to all those involved with GMP's Volunteer Police Cadet Scheme.

3. Roles & Responsibilities

It is important to state that everyone has a responsibility for safeguarding young people and vulnerable adults, and it is the responsibility of all leaders to attend training and familiarise themselves with GMP's safeguarding policies and procedures.

Final accountability for ensuring GMP fulfils its child protection and safeguarding responsibilities falls to the Chief Constable, with accountability related to the VPC delegated to the force Designated Responsible Officer (DRO). Responsibility is delegated to the Designated Safeguarding Lead (DSL) and safeguarding officers who are trained appropriately. A description of their responsibilities can be found in appendix 1. The lead responsible people are:

Safeguarding Role	Name	Role in GMP	Contact Details
Designated Safeguarding Lead (DSL)	[REDACTED]	Safeguarding Adults and Young People Lead	[REDACTED]
Designated Safeguarding Officer	[REDACTED]	CiP Inspector	[REDACTED]
Designated Safeguarding Officer	[REDACTED]	Volunteer Police Cadet Force Strategic Lead	[REDACTED]

GMP's VPC Scheme works closely with the National VPC to ensure that our scheme operates under the National Police Chiefs' Council supported framework, sharing the common Aims and Principles of the VPC across England & Wales. This close working relationship also ensures GMP are part of and benefit from the sharing of good practice, and learning is encouraged at a national level. All safeguarding issues, concerns, incidents and disclosures will be shared with the National Safeguarding Manager to provide oversight and ensure any lessons learnt are shared across the VPC network. The National VPC Safeguarding Manager is also available to offer advice and support.

National VPC Safeguarding Manager¹

- The National VPC Safeguarding Manager interprets legislation and makes sure forces are legally compliant and demonstrating good safeguarding practice.
- The National Safeguarding Manager has a remit to provide support to all VPC leaders; engage in a supportive/guidance role in the event of a suspicion or allegation of abuse occurring at Force/Unit level. The National Safeguarding Manager will assist Force Coordinators with implementing safeguarding changes, will engage with force coordinators in relation to lessons learned and will assist with force self-assessments and action plans in relation to the UK Youth Safe Space Charter (copy in appendices).

¹ <https://vpc.police.uk/media/1712/vpc-safeguarding-policy-july-2020.pdf>

- The National Safeguarding Manager has certain legal and regulatory obligations that all members of VPC must assist in meeting, as required. For example, we are required to provide information on a regular basis to the IOPC (Independent Office for Police Conduct), in response to Freedom of Information requests and also to the Disclosure and Barring Service (DBS) and in some instances the Charity Commission.
- The National VPC Safeguarding Manager is [REDACTED].
- As a result of the National VPC's High Level Review of the cadet Scheme it was deemed necessary for each police force that runs a VPC Scheme to nominate a Designated Responsible Officer (DRO). DROs will be the accountable person for the safe delivery of their VPC as a regulated youth activity; the description below was taken from the VPC National Safeguarding Policy.

Designated Responsible Officer (DRO)

- Force Strategic Lead (ACC, Chief Superintendent or another rank with additional authority): This role is the main communication link between the Regional CIP/VPC Lead and the Force Cadet coordinators. They should meet on a tri-year basis to review good practice; lessons learnt and support the National (Safeguarding) Hub Team in defining needs in training and development.
- In cases where there is an allegation or suspicion of abuse from a member of VPC the Strategic Lead MUST immediately be informed and it will be their responsibility to liaise with the ongoing Police investigation. This liaising role must continue and involve the management of the safeguarding concern with parents/carers; any communication on behalf of the VPC National Hub Team; and/or more specifically the National Safeguarding Manager.

4. Terms and Definitions

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

Safeguarding and promoting the welfare of adults is defined for the purposes of this policy as:

- Ensuring they can live in safety, free from abuse and neglect.
- Empowering them by encouraging them to make their own decisions and provide informed consent.
- Preventing the risk of abuse or neglect and stop it from occurring.
- Promoting their well-being and take their views, wishes, feelings and beliefs into account.

The following definitions have been taken from the National VPC Safeguarding Policy which can be found [here](#).

Child – Has a specific legal meaning of anyone below the age of 18 years.

Young Person – Has no specific legal definition. However, 12-18 years is the standard age associated with the term.

Adult – Has a specific legal meaning of anyone above the age of 18 years.

Safeguarding – For the purposes of this policy, we are using the terms ‘safeguarding’ and ‘to safeguard’ to describe the prevention and precautionary approach to planning and procedures needed to protect children, young people and adults from any potential harm.

Child Protection – Child protection is a process within the Safeguarding Policy and refers to the activity undertaken to protect children suffering from, or at risk of, significant harm (Working Together to Safeguard Children, 2018).

Child and young person focussed – our safeguarding practice places the views of children and young people at the centre of our policy planning and implementation processes. This approach ensures that their welfare remains paramount in all we do.

Adult Protection – Adult protection is part of safeguarding and refers to the activity undertaken to protect adults suffering from, or at risk of significant harm (No Secrets – Statutory guidance (2000), and Social Care Institute for Excellence (2011): Safeguarding Adults at Risk of Harm.

Adult at risk – An adult, who is, or may be, in need of community care services i.e. adult social services, because of mental health, disability, age or illness, and/or who is unable to care for themselves or unable to protect themselves from significant harm or exploitation. Appendix 2 contains a full list of who may be included as vulnerable.

Radicalisation – refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Safety – Safety is about being protected from and not causing, danger, risk, injury, loss or harm. Safety can be a feeling, a physical object or place, and an action, and sometimes refers to the laws, rules, and principles that are intended to keep people safe. Safety is not just about what happens inside the meeting place, it is also about outside it, including days out, and may be about something that is happening at home.

Wellbeing – Wellbeing refers to a person’s sense of contentment and satisfaction with their conditions in life and their current circumstances. It is closely linked to emotional balance and mental health but it also affected by an individual’s attitude, values and perspective.

Grooming – is the planned and deliberate act of manoeuvring an individual into a position of isolation to ensure they become a key influencer or ‘trusted person.’

LSCB – Local Safeguarding Children’s Board. These have been replaced in most areas by a Safeguarding Partnership (Care Act 2014).

LADO – Local Designated Safeguarding Officer. Not all areas have them however, the function must be completed. They will be involved in the management of allegations against people who work with children and have oversight. The VPC has been identified as a Regulated Activity provider we must ensure that any concerns or allegations made about any Leader or adult associated with Cadets must go to the LADO – Each Force will have a reporting process – please ensure you are clear on how this is done. This is a legal requirement – called a ‘duty to refer.’

MASH – Multi Agency Support/Safeguarding Hubs are structures designed to facilitate information-sharing and decision-making on a multi-agency basis, commonly through co-locating staff from the local authority, health agencies and the police in one facility.

Escalation - is the course of action that should be taken by professionals where there are concerns that the child or young person's safety is compromised and the current action of other agencies does not support effective safeguarding of the child or young person.

5. Procedure

5.1 Recognising Abuse

It can be very difficult and traumatic for people to speak up about the abuse they are suffering and they often fear there will be negative consequences if they tell anyone what is happening. Others may not be aware that they are being abused. Even if a child/young person or vulnerable adult does not speak up about what's happening to them it is vitally important that we are able to recognise the signs and know how to respond. Refer to appendix 3 for signs and indicators of abuse in children and vulnerable adults.

5.1.1 Radicalism and Involvement in Terrorism (Prevent)

The current threat from terrorism is considered to be real and 'substantial' and can involve the exploitation of young people and vulnerable adults therefore sits within safeguarding. The following are definitions of terrorism, extremism and radicalisation:

The national Counter-Terrorism (CONTEST) strategy focuses on 4 strands: Pursue, Prevent, Protect and Prepare; it is the Prevent strategy that is of relevance in safeguarding young people and vulnerable adults. The objectives of Prevent are:

- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism;
- Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support;
- Enable those who have already engaged in terrorism to disengage and rehabilitate.

This section of the VPC Safeguarding Policy is written with reference to the Prevent Duty outlined within Section 26 of the Counter Terrorism and Security Act 2015 and the specific Prevent Duty Guidance. See [here](#) for further detail.

Please see [appendix 4](#) for official definitions of terrorism, extremism and radicalisation.

Individuals at risk of radicalisation often suffer from low self-esteem, can be socially isolated or victims of bullying and/or discrimination. Extremists will use these vulnerabilities to target them, making them feel special or part of a larger cause in order to isolate them from friends and family. Sometimes, family members or friends are the radicalising influence, or the individual is in contact with extremist groups and organisations, either face to face or online.

Radicalisation can be difficult to spot but below is some of the signs that may indicate a child or vulnerable adult is being radicalised:

- isolating themselves from family and friends;
- increased levels of anger;
- unwillingness or inability to discuss their views;
- increased secretiveness, especially around internet use;
- talking as if from a scripted speech;
- a sudden disrespectful attitude towards others.

It is important to acknowledge that this is not an exhaustive list and these signs do not necessarily mean a child or vulnerable adult is being radicalised. Remember, that by following GMP's safeguarding procedure you are not making a judgement call about the individual, you are merely highlighting a concern that needs to be investigated further.

Just like any other safeguarding concern you may have, if you suspect anyone may be being radicalised you should follow GMP's VPC Safeguarding Procedure ([appendix 5](#)).

As well as reporting concerns, the VPC has a vitally important role in preventing our cadets becoming victims of radicalisation. Through the sessions we deliver to our cadets, and effective facilitation of discussions, the VPC should provide a safe space for our cadets to understand the risks associated with terrorism and develop the knowledge, confidence and skills to challenge extremist arguments.

Further information can be found here <https://www.ltai.info/>

5.2 How to deal with concerns, disclosures and safeguarding incidents

Where you have a concern that a child or vulnerable adult is being abused or there is potential for harm, you should discuss your concerns with your session lead and/or the on call safeguarding officer and together a decision will be made about what action should be taken. On occasions where a safeguarding officer is not available, you should contact your district duty officer. It may be necessary to make a referral to the relevant MASH team or another agency and it is vitally important you support this referral to ensure the information shared is accurate. See the flowchart in appendix 5 for full details of the process.

It is important that any safeguarding concerns, incidents or disclosures are recorded on the GMP Safeguarding Form ([appendix 7](#)) and sent to safeguarding@gmp.police.uk. GMP shares all safeguarding referrals with the National VPC Safeguarding Manager to ensure we get the best outcomes for our cadets.

Remember that in this context it is not your duty to investigate the concern, even if you are a police officer. Your duty is to follow the 5Rs (outlined below) and ensure the immediate safety and wellbeing of the child/young person or vulnerable adult.

The '5Rs' underpin these reporting procedures as follows:

- **Recognise** concerns that a child/young person is being harmed or might be at risk of harm.
- **Respond appropriately** to a child/young person who is telling you what is happening to them.
- **Refer** the concerns on to your Designated Safeguarding Lead, Session Lead or straight to the emergency services (if the incident warrants this).
- **Record** the concerns appropriately and any subsequent action taken.
- **Resolution** and escalation are the responsibility of the Designated Safeguarding Lead to follow up referrals made to the authorities and if necessary, escalate concerns if identified risks remain.

5.3 Safeguarding Allegations Made against Staff/ Police Support Volunteers/Leaders

In line with Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2020, the Safeguarding Flowchart for Allegations/Concerns relating to

Staff/Volunteers/Leaders (appendix 6) should be applied when there is an allegation that any person who works with children has:

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

Upon receiving a safeguarding concern relating to staff, Police Support Volunteers and VPC leaders the safeguarding officer will not investigate the concern but will only gather information. Following this, GMP's VPC Problem Solving Guidance will then be followed and a decision will be made as to whether the allegation meets any of the criteria outlined above, and what action needs to be taken as a result. The accused individual/s will not be informed of the allegation before consideration has been given to the implications this may have on potential victims or any subsequent investigation. If the allegation was so serious, relating to a GMP employee, and necessitated a referral to the Professional Standards Branch (PSB) under the criteria outlined above, PSB would complete a severity assessment and make a determination surrounding their GMP role. If the allegation meets the criteria outlined above then a referral must be made to the relevant LADO (Local Authority Designated Officer) within 1 working day. If they are not a GMP employee then a decision will be made whether their employer needs to be contacted and made aware of the allegation based on any safeguarding concerns. [GMPs Reporting Concerns policy](#) should be referred to in such instances.

Working Together to Safeguarding Children 2018 identifies the role of the Local Authority Designated Officer (LADO) as that of managing and having oversight of individual cases, provision of advice and guidance to employers and voluntary organisations, liaison with the police and other agencies, and the monitoring of cases to make sure they are dealt with as quickly as possible and are consistent with a thorough and fair process.

It is imperative that allegations against staff, Police Support Volunteers and VPC leaders are dealt with as efficiently as possible to:

- Minimise the risk to the child/adult at risk.
- Minimise the impact on the child/adult at risk.
- Ensure a fair and thorough investigation for all parties.
- Limit reputational damage to GMP.

GMP accepts that those who are concerned about the conduct of another colleague towards a child or young person are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleagues' career. All staff and Police Support Volunteers must remember that the welfare of the child is paramount and must report the concerns immediately.

5.3.1 Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power

this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship (Caring for Young People and the Vulnerable).

A relationship between an adult and a child or young person cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential.

Where a person aged 18 or over is in a specified position of trust (Sexual Offences Act 2003) with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

This means that adults should not:

- use their position to gain access to information for their own or others' advantage;
- use their position to intimidate, bully, humiliate, threaten, coerce or undermine children or young people;
- use their status and standing to form or promote relationships which are of a sexual nature;
- his section is underpinned by the following government Policies and Law.

Further guidance on making a safeguarding referral can be found [here](#).

5.4 Recruitment and Training of Staff and VPC Leaders

Because of the nature of its work, GMP requires all staff and Police Support Volunteers working on the VPC Scheme to have an enhanced DBS check, as well as annual GMP vetting and monthly PND. No one is permitted to work with young people through the VPC unless these checks have been done. All staff and Police Support Volunteers will be asked to register with the update service and DBS checks will be done yearly. Adverse information contained in a disclosure will not automatically act as a bar to employment. The disclosure may contain details of spent convictions irrelevant to employment with children or relevant adults, and care is taken not to treat an adverse entry on a disclosure as an automatic bar to employment. In cases where adverse information is received, the details of this adverse information should be sent to force CiP Inspector who, with the Volunteer Police Cadet Force Strategic Lead and Force Safeguarding Lead, will consider the suitability of the individuals recruitment continuing. To minimise risk further, all staff and Police Support Volunteers will be asked to provide 2 references before starting in their role with the VPC.

Before starting in their VPC role all staff and volunteers will undertake an induction programme that includes safeguarding and training on the prevention and detection of child abuse (including awareness raising, signs and symptoms, disclosure and working with young people who have been abused) and a full briefing on the safeguarding policy and procedures.

Further training will be offered in partnership with the National VPC team, as well as any other partners as and when appropriate. This ongoing training will include content on working with young people, first aid, youth work principles, managing behaviour as well as regular safeguarding updates and refreshers. GMP expects all those involved in the VPC to engage with our safer recruitment procedures and induction process to ensure the highest possible standards to safeguard our cadets.

GMP has signed up to the National VPC's code of conduct for leaders and other adults. The statements, which can be found as appendix 8, sets out the minimum expectation of all adults involved in the VPC.

GMP's safeguarding lead and safeguarding officers will undertake appropriate Area Child Protection Committee approved training regularly. Safeguarding, and in particular child protection, practice will be monitored through supervisions, 1-2-1s and team meetings to develop breadth and consistency of understanding in accordance with their roles and responsibilities.

5.5 Social Media/Online Communicaton

We have a responsibility to protect and promote the safety and wellbeing of everyone involved in the VPC, both online and offline. Therefore, it is important to ensure all staff and volunteers involved in the VPC are aware of their responsibilities relating to the use of technology and social networking sites.

A Statement of Purpose, outlining GMPs expectations relating to online content can be found on the National VPC Safeguarding Guidance A-Z webpage, <https://vpc.police.uk/media/1708/82-social-media-statement-of-purpose.pdf>

The following guidelines apply to all VPC social media accounts and must be adhered to:

- Only official GMP VPC social media accounts, Dutysheet and the Marshall Portal should be used for any business relating to the VPC.
- All VPC social media accounts must be approved by the central VPC team and only approved individuals can use these accounts; details of all those who have access will be stored centrally.
- Staff/VPC Leaders should not make friend requests to young people, they can only accept them. Staff are responsible for ensuring that member social media accounts are genuine before accepting requests.
- Staff/VPC Leaders should not 'friend', 'connect', 'follow' their own personal account or that of their friends/family/personal associates.
- Communication with cadets should take place in open forums such as the main Facebook/Instagram page, groups or group messages. Another member of staff or VPC Leader must always be made aware of and check when the group message function is used.
- Communication with cadets through social media must always be for a specific purpose such as planning an event or sharing information and we should avoid excessive social chat and conversation and be mindful of the time at which they are communicating.
- The private or direct messaging function in a one to one setting must not be used. If a cadet tries to make contact using the private or direct messaging function it should be responded to in an open forum or by another means of communication.

Staff/Police Support Volunteers involved in the VPC should not have any contact with cadets through personal social media accounts or any other form of personal, electronic communication (email, etc). If a young person attempts to make contact with staff/Police Support Volunteer online this should be reported to a supervisor and the Central VPC team to be logged on the VPC risk register. The same procedure applies if any adult involved in the VPC has a legitimate reason to have online contact with a cadet. An example of this could be a VPC leader is related to a cadet and may be friends on social media platforms.

5.6 Adult to child ratios

To ensure the safety of our cadets and Police Support Volunteers it is important to ensure that we have the appropriate level of supervision whenever we work with young people. There are different adult to child ratios for different situations and the ratios change depending on:

- The location of the meeting or activity;
- The type of activity;
- Whether children of volunteers are present.

Below are the minimum ratios for different activities but it is important to remember that for each activity a [risk assessment](#) should be completed and supervision ratios should be considered as part of this. Any risk assessment should take into account children and young people's behaviour, ability and mobility, as well as the need to have male and female leaders on all off-site activities and overnight stays. To ensure young people's needs are met fully it, may be appropriate to include input from young people and/or parents/carers.

For the purpose of this policy and child or young person is anyone under the age of 18.

In some exceptional circumstances it may not be possible to maintain the levels set out in this policy. This should always be flagged with the relevant unit coordinator and the central team.

Activity	Adult to child or young person ratio	Mandatory ratio
Cadet session	1:10	Minimum 2 adults irrespective of the group size
Off-site cadet activity	1:4	Minimum 2 adults irrespective of the group size
Residential activity	1:4	Minimum 2 adults irrespective of the group size

5.6.1 Children of Leaders

Sometimes VPC Leaders may need or want to bring their own children to cadet sessions, activities and/or residential events. In most cases this should not cause a problem but it may not always be appropriate and should only be done after consulting with the relevant unit leader. This does not change adult to child ratios and children of VPC Leaders should be included in the ratios above. If a VPC Leader brings their child to an offsite trip or residential activity, it is advised that they are supervised by another adult.

5.6.2 First Aid Ratios

We recommend that all cadets leaders are trained in emergency first aid; this training is offered via people and development branch. During all cadet activities first aid must be considered as part of the risk assessment, including whether any specific medical issues exist.

5.7 Photo/Video Guidance

It is important that children and young people feel happy with their achievements and have photographs and films of their special moments. However, some children, parents/carers may not be comfortable with images of themselves or their children being taken or shared. Therefore, it is important GMP has procedures in place to respect these wishes as well as safeguard everyone involved in the VPC.

When joining the cadets all young people are asked if they and their parents/carers consent to their picture being taken and used on our website and social media pages. It is important

that a leader familiarises themselves with this young people who have and do not have consent for their pictures to be taken. If GMP do not have consent to take and use pictures of a young person it is important that this is respected without excluding anyone from an activity.

It is important to be aware of data protection, child protection and safeguarding issues when taking photos of or filming children and young people. The potential for misuse of images/videos can be reduced if we ensure everyone follows these principles:

- Personal devices should not be used to take photographs or record video footage during cadet sessions. All photographs taken and videos recorded during cadet sessions should be done using GMP provided equipment.
- All photographs/videos taken should be appropriate and reflect the VPC's values and expectations of behaviour.
- Cadet's names should be not be published if an image of them is used.

5.8 Health and Safety

[GMP's Health and Safety Policy](#) has additional information to ensure the safe operating of all activities associated with GMP including the VPC programme. Specific Health and Safety arrangements for VPC units can be found [here](#). Additionally, cadet activities must be subject to risk assessment either generically for the unit or specific to activities, these documents/templats can be found [here](#).

A Health and Safety induction will be given to all cadets and all cadet leaders will receive risk assessment training.

5.8.1 Off Site Procedure

Off-site visits and activities often provide exciting and life-enhancing opportunities that add great value to GMPs VPC scheme. When done well, they help develop self-esteem and can stimulate social, environmental and emotional development, as well as achieving other educational aims. Whilst there can be no doubt as to the benefits gained, we must also have regard to the risks involved. It is essential that off-site visits/trips, residential activities and all adventurous activities are carried out with the highest regard for the health and safety of both the young people and adults involved.

In order for any trip or residential activity to take place, the following steps must be followed.

- Central VPC team notified of activity.
- Risk assessment completed and sent to GMP Health and Safety Unit for approval 14 days before proposed activity. Risk assessment must be approved for any activity to take place.
- GMP insurers notified and sent copy of completed risk assessment.
- Form 2111 completed and sent to Central VPC team.

5.9 Escalation Policy

When working in the arena of safeguarding it is inevitable that there will at times be professional disagreement. This could be related to; the criteria for referrals; outcome of assessments; roles and responsibilities or workers; information sharing and communication and service provision. These disagreements can happen within a service or between different services. Whilst it is accepted that this will happen, it is important that it does not affect the outcomes for the subject/s of a safeguarding concern.

It is always best to avoid disputes happening and ensuring clarity of roles is a very effective way of reducing the likelihood of disputes occurring. The safety and wellbeing of children/young people/adults should be the paramount consideration and it is important that any professional disputes are resolved quickly. The Manchester Safeguarding Children Board has created an [Escalation Policy and Procedure](#) which should be used when there are instances of professional disagreements.

5.10 Confidentiality and Information Sharing

Confidentiality is an important principle that enables people to feel safe in sharing their concerns and seeking help. However, confidentiality can not always be maintained and the effective and appropriate sharing of information with the right people at the right time is vital to good safeguarding practice. Wherever there is a concern that there might be a child protection or safeguarding issue, everyone involved with GMP's VPC must be clear that they have a duty to refer their concern to through the appropriate channels.

If an adult or young person makes a disclosure or says or does something which may cause concern then you should tell the individual that you will be sharing your concern. It is important to reassure them that they have not done anything wrong and you are only sharing the concern to help them and ensure their safety.

When sharing information with external organisations it is important to remember the 'seven golden rules' to sharing information, which can be found in [appendix 9](#).

It is not appropriate for staff or volunteers to discuss sensitive issues about young people or other staff/volunteers with or in the presence of other young people.

6. Associated Documents

The following legislation is relevant to this policy, either because it has influenced its introduction and/or its content:

- [Health and Safety at Work Act 1974](#)
- [Rehabilitation of Offenders Act 1974 \(Exceptions\) Order 1975](#)
- [The Police Act 1997](#)
- [Protection of Children Act 1999](#)
- [Management of Health and Safety at Work Regulations 1999](#)
- [The Human Rights Act 1998 and the United Nations Convention the Rights of the Child](#)
- [Sexual Offences Act 2003](#)
- [The Children Act 1989; 2004](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Equality Act 2010](#)
- [Protection of Freedoms Act 2012](#)
- [GDPR and data protection act 2018](#)
- [Social Services and Well Being Act 2014](#)
- [The Care Act 2014](#)
- [The Covid Act 2020](#)

7. Statutory Compliance & Consultation

7.1 Statutory Compliance

7.1.1 Equality Act (2010)

This policy and procedure aims to ensure that all incidents and/or disclosures concerning the safety and wellbeing of everyone involved with GMP's VPC Scheme are dealt with in a professional manner which shows due regard of the Equality Act 2010.

The enjoyment of the rights and freedoms set forth in the European Convention of Human Rights shall be secured without discrimination on any grounds. Actions taken as a consequence of this policy and procedure will be applied fairly and impartially, having due regard to natural justice and human rights.

The policy will have no adverse impact on members of those communities from a protected group as it has been developed taking cognisance of all groups represented within the community and workplace.

7.1.2 The General Data Protection Regulation (GDPR) and Data Protection Act (2018)

Greater Manchester Police has a duty to ensure, so far as is possible, that all staff comply with the provisions of the GDPR and the Data Protection Act 2018, particularly relating to their access to, and dissemination of, a wide variety of personal information and intelligence.

This policy and procedure has been assessed for compliance issues by the Information Compliance and Records Management Unit (ICRMU), and is considered to be compliant with the legislation as, where necessary, there is a clear lawful basis for the processing of personal data and special category data. It should be read in conjunction with GMP's Data Protection Policy and guidance issued on the Data Protection Intranet pages.

For more information on Data Protection please contact the ICRMU on ext. [REDACTED].

7.1.3 Freedom of Information Act (2000)

The Freedom of Information Act 2000 (FOIA) grants a general right of access to all types of recorded information held by public authorities. Parts of this policy and procedure have been assessed as disclosable upon request under Freedom of Information with prior approval from the author and with careful assessment by the Information Compliance and Records Management Unit taking into account the harm of disclosure and release into the public domain. For advice and assistance on FOI, please contact [REDACTED].

7.2 Consultation

The table below outlines the parties that have been consulted when drafting this policy and procedure:

Department	Comments
Information Compliance	7.1.2 & 7.1.3 added – [REDACTED], Compliance Officer
Consultation: [REDACTED] GMB Trade Union, [REDACTED], AWP, Black and Asian Police Association, GMP Christian Police Network, [REDACTED], Disability Support Network, [REDACTED]	Feedback received and amendment made - 5.3

8. Appendices

Appendix 1 - Safeguarding Officers Responsibilities

Designated Safeguarding Team Roles and Responsibilities

It is important to note that all staff and volunteers have a safeguarding responsibility which includes:

- Being vigilant of the signs that may indicate a child/young person is experiencing harm or is at risk of harm;
- Report any disclosures or concerns, as soon as possible following GMP safeguarding policies and procedures;
- Ensure child/young persons' safety and welfare is always prioritised;
- Adhere to GMP's code of conduct.

To ensure safeguarding policies and procedures are implemented effectively and all staff and volunteers are supported GMP has a Designated Safeguarding Lead as well as some named safeguarding officers. The roles and responsibilities of this team are outlined below.

Designated Safeguarding Lead (DSL)

- Being available for all staff and volunteers to discuss any safeguarding issues or concerns. They should ensure that all staff are aware of the DSL and Safeguarding Officers contact details.
- Ensuring that cases of suspected or actual child protection or safeguarding concerns are referred to the appropriate agencies; supporting staff and volunteers to make referrals where appropriate. The DSL will gather further information and evidence if needed.
- Ensuring that all staff are fully trained in safeguarding and know how to spot and raise concerns.
- Undergoing regular refresher training themselves to ensure their safeguarding knowledge is as up to date as possible and in line with new guidance.
- Ensuring that adequate reporting and recording systems are in place for safeguarding procedures, including coordination of 'on call' support.
- Ensuring that VPC's safeguarding policies and procedures are up to date with the most recent statutory guidance, and that everyone who has safeguarding duties are familiar with any updates.
- Complying with any Local Safeguarding Children Partnership (LSCP) requirements.
- Ensuring their organisation has sufficient safer recruitment procedures.
- Liaise with the Safeguarding Officer/s, communicating information relating to concerns/investigations, ensuring that there is always cover for this role.

Safeguarding Officers

- Support the DSL with carrying out the role of safeguarding everyone involved with the VPC Scheme.
- Being available for all staff and volunteers to discuss any safeguarding issues or concerns.
- Liaise with the DSL, communicating information relating to concerns/investigations, providing cover for 'on call' support when necessary.

- Where necessary deputise or attend meetings on behalf of the designated safeguarding lead.
- Ensuring that cases of suspected or actual child protection or safeguarding concerns are referred to the appropriate agencies; supporting staff and volunteers to make referrals where appropriate.
- Undergoing regular refresher training themselves to ensure their safeguarding knowledge is as up to date as possible and in line with new guidance.

Appendix 2 - List of Vulnerable Adults

The definition of vulnerable adults is broad and includes anyone who:

- is living in residential accommodation, such as a care home or a residential special school;
- is living in sheltered housing;
- is receiving domiciliary care in his or her own home;
- is receiving any form of health care;
- is detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act 1999;
- is in contact with probation services;
- is receiving a welfare service of a description to be prescribed in regulations;
- is receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions. (age-related needs includes needs associated with frailty, illness, disability or mental capacity)
- is an expectant or nursing mother living in residential care
- is receiving direct payments from a local authority/HSS body in lieu of social care services;
- requires assistance in the conduct of his or her own affairs

Appendix 3 - signs and indicators of abuse in children and vulnerable adults

Types of abuse for children and young people

Abuse is “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 another child or children” (Working Together to Safeguard Children, July 2018).

In relation to child protection there are 4 kinds of abuse defined in “Working Together”, they are:

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. They may be abused by an adult(s) or other young people.

Signs of this could be;

- Unexplained recurrent injuries or burns;
- Improbable explanations or refusal to explain injuries;
- Wearing clothes to cover injuries, even in hot weather;
- Absconding;
- Fear of medical help or examination;
- Self-destructive tendencies;
- Aggression towards others;
- Fear of physical contact - shrinking back if touched;
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study');
- Fear of suspected abuser being contacted;
- Bruises seen on parts of the body not normally harmed through play, such as in or around the mouth.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve:

- conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate;
- age or developmentally inappropriate expectations being imposed on children (including interactions beyond the child’s developmental capability as well as overprotection and limitation of exploration and learning) or preventing the child participating in normal social interaction;
- seeing or hearing ill-treatment of another;
- serious bullying, 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 ill-treatment of a child, though it may occur alone.

Signs of this could be:

- Very low self-esteem, often with an inability to accept praise or trust in adults;
- Excessive clinging and attention seeking behaviour;

- Overanxious – being excessively ‘watchful’ (hyper vigilant), constantly checking or being overanxious to please;
- Withdrawn / socially isolated;
- Physical, mental and emotional development lags;
- Sudden speech disorders;
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc.');
- Overreaction to mistakes;
- Extreme fear of any new situation;
- Inappropriate response to pain ('I deserve this');
- Neurotic behaviour (rocking, hair twisting, self-mutilation);
- Extremes of passivity or aggression behaviour.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or oral sex) or non-penetrative acts (including kissing 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 or watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Adult males and females as well as other children can all commit acts of sexual abuse.

Signs of this could be;

- Being overly affectionate or knowledgeable in a sexual way inappropriate to their age, or acting out precocious sexual behaviour with others;
- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Other extreme reactions, such as depression, self-harm, suicide attempts, running away, overdoses, anorexia;
- Personality changes such as becoming insecure or clinging;
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys;
- Sudden loss of appetite or compulsive eating;
- Being isolated or withdrawn;
- Inability to concentrate;
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a specific person;
- Suddenly drawing sexually explicit pictures;
- Trying to be 'ultra-good' or perfect; oversensitive or overreacting to criticism;
- Reluctant to go home.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born it may involve a parent or carer failing to:

- provide adequate food, nutrition, shelter and clothing;
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of this could be:

- Constant hunger and complaints of tiredness;
- Poor personal hygiene;
- Poor state of clothing;
- Untreated medical problems;
- No social relationships;
- Compulsive scavenging;
- Destructive tendencies;
- Below average weight/height;
- Reluctant to go home, particularly at weekends/holiday.

In addition to these four types of abuse, there are safeguarding issues that can put children and young people at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger (Keeping Children Safe in Education, 2019).

Another form of recognised abuse is **forced marriage**. This is different from an arranged marriage in that it is a marriage where the young person does not consent. Guidance is available from the Foreign and Commonwealth Publication, Forced Marriage Guidelines on www.fco.gov.uk

Another type of abuse that we must be aware of is **Peer abuse. This is abuse that happens between children of a similar age or stage of development. It can happen between any number of children, and can affect any age group (Department for Education (DfE), 2021a)**. There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement.

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. GMP's VPC bullying policy should be referred to for guidance. However, it is important to point out that in the VPC we have a zero-tolerance approach to sexual violence and sexual harassment and it is important that everyone is aware that it is never acceptable. As is the case with any negative behaviour prevention is always the best measure and it is important that all VPC Leaders understand these behaviours can be caused by wider societal factors and that sexist stereotypes and sexist language is never acceptable and should be challenged robustly.

Child sexual exploitation (CSE)² is a type of sexual abuse. When a child or young person is exploited they are given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities. Children and young people are often tricked into believing they are in a loving and consensual relationship. This is called grooming. They may trust their abuser and not understand that they are being abused.

Signs of this could be:

- Suddenly becoming more secretive;
- Having money or items which can't or won't be explained;
- Sexually transmitted infections;
- Becoming withdrawn from family friends;
- Periods of missing from home;
- Change in school attendance;

² <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/>

- Alcohol and/or drug misuse;
- Sharp changes in mood or character;
- Older boyfriends/girlfriends;
- Involvement in criminal activity;
- Displaying inappropriate sexualised behaviour;
- Sudden, unexplained change in appearance.

Child criminal exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity. Often, this is done; in exchange for something the victim needs or wants; for the financial or other advantage of the perpetrator or facilitator; through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact, it can also occur through the use of technology. The criminal exploitation of children can be linked to county lines as well as other forms of criminal activity such as theft, acquisitive crime, knife crimes and other forms of criminality.

Signs of this could be:

- In a relationship or hanging out with someone older than them.
- Being isolated or withdrawn.
- Using new slang words.
- Being angry, aggressive or violent.
- Unexplained injuries.
- Wearing clothes or accessories in gang colours or getting tattoos.
- Becoming more secretive.
- Spending more time online or on their phones.
- Having a new phone or phones.
- Periods of missing from home.
- Change in school attendance.
- Alcohol and/or drug misuse.
- Having unexplained money and buying new things.
- Involvement in criminal activity.
- Carrying weapons.

There are similarities between different forms of exploitation and the criminal and sexual exploitation of children may overlap. Victims of child exploitation may, at any one time, be subject to both CCE and CSE.

Types of abuse for vulnerable adults

In addition to forms of abuse described above, the following are commonly recognised as forms of abuse in relation to vulnerable adults:

Online and 'mobile' abuse

Including cyberbullying; sexting; sexual interaction that is either explicitly sexual in nature or intended to elicit from the child a communication which is sexual via webcam or other online/mobile phone messaging service; 'revenge porn' (distribution of explicit material with intention of publicly humiliating an individual).

Psychological abuse

Threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks.

Modern slavery

Underpinned by the Modern Day Slavery Act 2015 this Includes human trafficking, forced labour and domestic servitude. Traffickers and slave masters use the means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhuman treatment.

Financial or material abuse

Including theft, fraud, exploitation, intentional mismanagement of the person's finances or property, withholding of money or possessions, pressure in connection with wills, property, inheritance or financial transactions or the withholding, misuse or misappropriation of property, possessions or benefits and failure to access benefits.

Discriminatory abuse

Includes the use of hurtful language, harassment or similar maltreatment of an individual on the basis of their race, sex, age, disability, faith, culture or sexual orientation.

Institutional abuse

This includes the use of systems, routines, practice or care that neglect individual needs and create an imbalance and control within a managed setting such as residential/nursing care or day services.

Abuse of civil rights

This includes the denial of, or coercive influence on, an individual's rights to be registered and to vote, the right to be treated as an equal with dignity and respect, the right of freedom of speech or movement and forced marriage.

Appendix 4 - National Counter-Terrorism Strategy (CONTEST) Definitions

Terrorism is defined by the Terrorism Act 2000 as:

“An action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.”

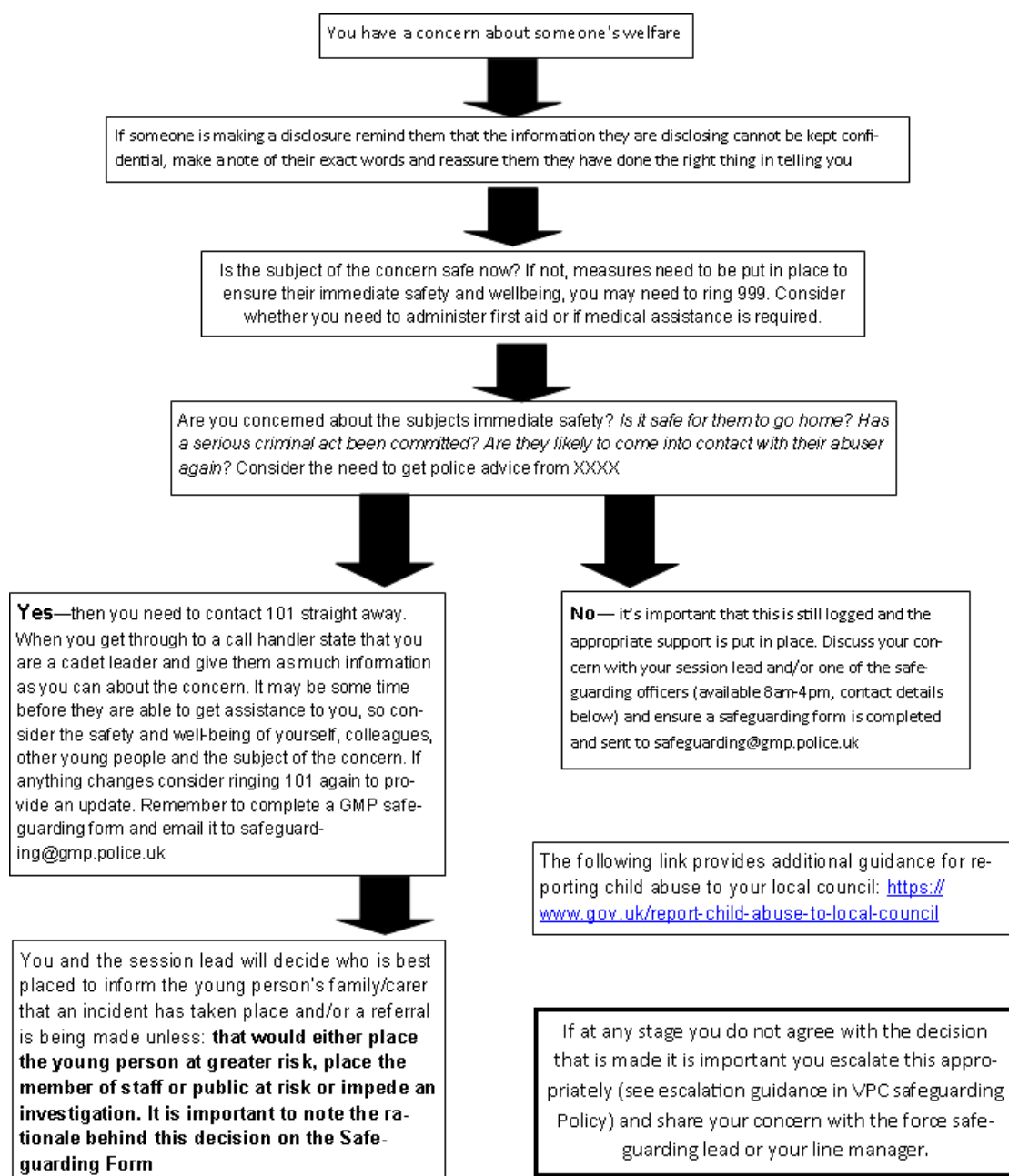
Extremism is defined in the national Counter-Terrorism Strategy (CONTEST) as:

“A vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of our armed forces, whether in this country or overseas.”

Radicalisation is defined in the CONTEST Strategy as:

“The process by which a person comes to support terrorism and forms of extremism leading to terrorism.”

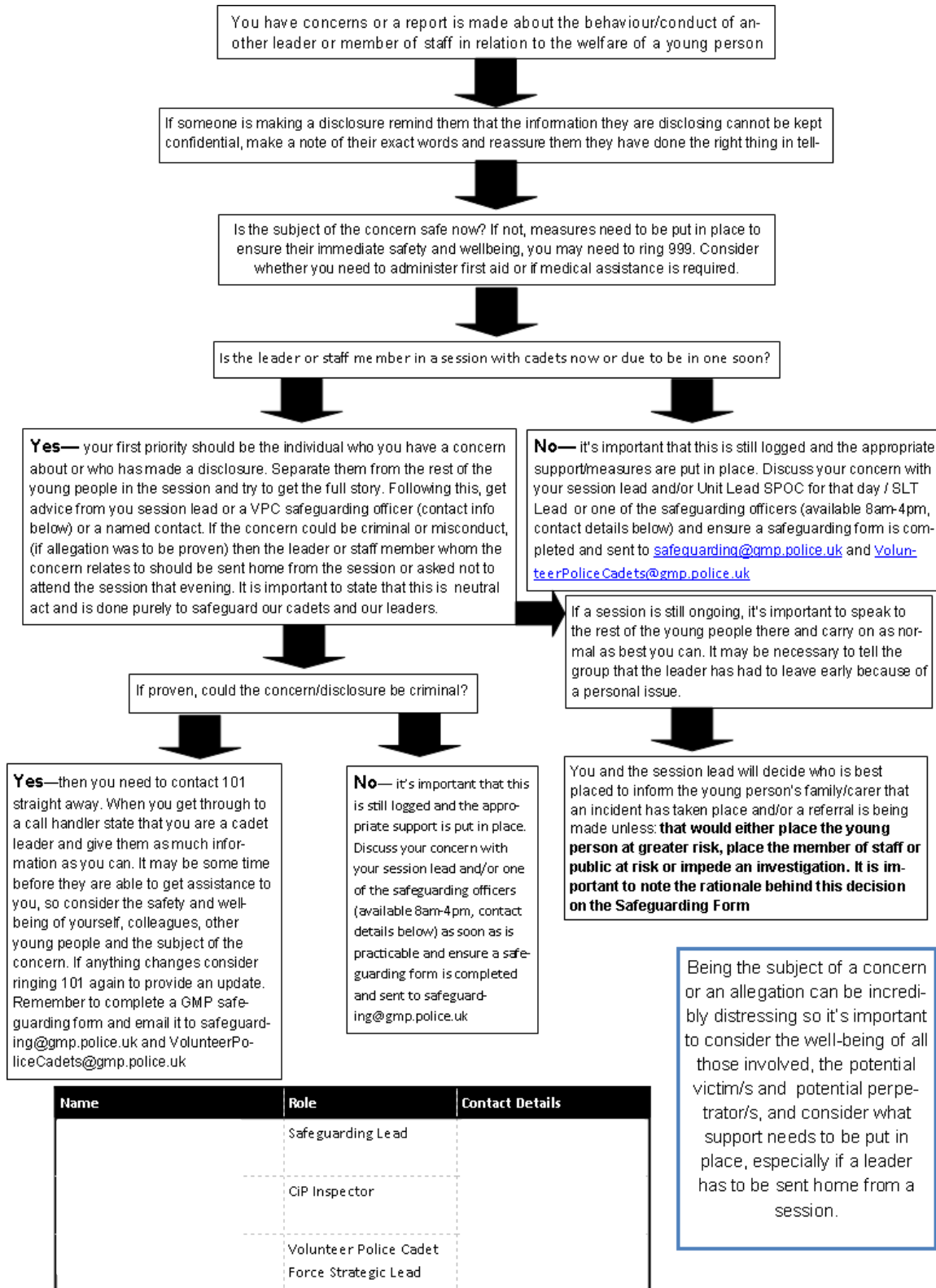
Appendix 5 - GMP VPC Safeguarding Procedure Flowchart



Remember it's likely that this process is incredibly distressing for a young person so make sure you keep them as informed as you can.

Name	Role	Contact Details
	Safeguarding Lead	
	CIP Inspector	
	Volunteer Police Cadet Force Strategic Lead	

Appendix 6 - Safeguarding Flowchart for Allegations/concerns relating to Staff/Police Support Volunteers/VPC Leaders



Name	Role	Contact Details
	Safeguarding Lead	
	CIP Inspector	
	Volunteer Police Cadet Force Strategic Lead	

Appendix 7 - GMP Safeguarding Reporting Form

Guidance for handling a Disclosure or Concern:

- Take all complaints, allegations or suspicions seriously
- Ensure the immediate safety and wellbeing of the person affected
- Stay calm, and offer support and reassurance to the person making the disclosure
- Do not make any promises regarding confidentiality
- Listen, keep questions to a minimum, make brief but careful notes and check the person affected agrees with them (where applicable)
- Explain what you will do
- Do not investigate

Details of person at risk			
Name of young person/adult		Date of birth	
Address		Contact details	
Parent/carer/emergency contact name and contact details		Other staff/volunteers aware of concern	

Do these concerns relate to a specific incident/disclosure? If YES complete Section A; If NO, omit section A and move straight to Section B			
Section A			
Date and time of incident/disclosure		Location of incident/disclosure	
Was disclosure made to you or someone else?		Other persons present	

Section B			
Details of concern/incident/disclosure (<i>dates, times, descriptions of events, full names and whether the information is first hand or the accounts of others; try to use exact wording if possible</i>)			
Date and time of disclosure/incident:			
Are there any injuries as a result of the concern <i>provide details</i>	YES/NO		
Are any other young people/adults involved, aware of the concern or potentially at risk? <i>Please provide details</i>	YES/NO		
Is an immediate referral required?	YES/NO	Give details of any action taken	

Give details who referral has been made to (<i>What was discussed? Agreed outcomes? Further actions; by whom?</i>)	
--	--

Your details			
Your Name		Your role	
Date form completed		Your contact details	
Safeguarding officer concern reported to		Signed	

Please send this form to safeguarding@gmp.police.uk and vpc.safeguarding@vpc.police.uk

To be completed by designated safeguarding lead or safeguarding officer			
Action taken by DSL/safeguarding officer: <i>include measures to support/safeguard individual/s who are making referral</i>			
Full name		Date	
Signature			

Further action taken by DSL:			
Full name		Date	
Signature			

Appendix 8 - VPC Code of Conduct

1. Be a good role model with behaviour and an attitude that are in line with our values and the
2. Police Code of Ethics.
3. Comply with all applicable UK laws and guidance
4. Make sure you follow Volunteer Police Cadets and
5. local policies and procedures and re-read them from time to time as they may be amended.
6. Be responsible and accountable in the way you perform your role.
7. Be fair and treat everyone with respect and dignity in accordance with the police code of ethics.
8. Respects others' privacy in line with the Data Protection and GDPR guidance and policy.
9. Communicate with others in an open and respectful way whether in person, by phone, writing or digital media.
10. Work together with other VPC members, their parents/carers and members of the public to promote the aims of the Volunteer Police Cadets

Appendix 9 - The seven golden rules to sharing information³

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

3

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf