SOUTH & CITY COLLEGE BIRMINGHAM

Safeguarding and Child Protection Policy (and linked Associated Procedures)

2025-2026

Safeguarding and Child Protection Policy

1. Purpose (Aims of the Policy)

1.1 This Policy represents the College's response to the need to protect all students, especially children, young people, and adults at risk and those with identified needs at all College centres and in the workplace. Everyone working in, or for the College shares an objective to help keep children and young people safe by:

- providing a caring, positive and safe environment for children and young people that promotes personal development and positive behaviour
- identifying children and vulnerable young people who are suffering or likely to suffer significant harm and taking appropriate action with the aim of making sure they are kept safe both at home and in the College setting.
- setting clear standards of behaviour for staff and students
- promoting safe practices and challenging poor and unsafe practice
- providing channels for students, apprentices and adults at risk to raise concerns and having clear procedures to effect immediate response and action
- ensuring employers have a clear understanding of their responsibility in safeguarding apprentices and students on work experience and how to raise concerns.
- Ensuring robust processes and procedures are in place to promote safer recruitment to prevent unsuitable people working with all students.

1.2 The College will fulfil its local and national responsibilities as laid out in the following documents.

- Children's Acts 1989 and 2004
- Cyber Security Standards for Schools & Colleges
- Working Together to Safeguard Children December 2023 Statutory Guidance
- Working Together to Safeguard Children, December 2023 Statutory Framework
- Keeping Children Safe In Education July 2025
- Guidance for Safer Working Practice in Education Settings February 2022
- Care Act 2014
- Prevent duty guidance: England and Wales (2023) update march 24
- No Secrets', the Children Act (1989 and 2004)
- Education Act 2002
- Education Act 2011
- Filtering and monitoring standards for schools and colleges
- Further and HE Act 1992
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Section 26 (1) of the Counter Terrorism and Security Act 2015
- Inspection Framework
- Modern Slavery Act 2015
- Keeping children safe in out-of-school settings: code of practice
- Office of students statement of expectations for preventing and addressing harassment and sexual misconduct affecting students in higher education
- Review of sexual abuse in schools and colleges
- Health and Safety at Work 1974,

2. Scope

2.1 This Policy applies to all those studying and visiting any college campus, including students, staff, Governors, volunteers and visitors including contracted agency staff and, employers offering work placements.

2.2 A 'child' is defined as a person aged up to 18. A care experienced learner (a Child in Care or Care leaver) and students with special education needs up to the age of 25 may also need additional services, assistance, protection, and consideration.

2.3 An adult at risk is a person aged 18 years or over who is, or may need community care services, defined by the Safeguarding Vulnerable Adult Act 2006. It may also include adults who are vulnerable for some other reason, for example those who have caring responsibilities, special educational needs, mental health, or who have suffered abuse or trauma.

2.4 Students aged 14-16 whose main education provider is a school are covered by all aspects of the policy when at college. The DSL team will contact the school who retain accountability for external referrals when a disclosure is made at college.

2.5 Employers and training providers will be asked to co-operate with the college, putting into place and subscribing to appropriate safeguards.

3. Responsibility (Governing Body Responsibilities)

3.1 South and City College is led by a Senior Leadership Team and Governing Body (Corporation) whose aims are to provide a safe environment and vigilant culture as outlined in Keeping Children Safe in Education where students can learn and be safeguarded.

3.2 The Senior Leadership Team and Corporation are committed to ensuring that:

- The development and implementation of the Policy is overseen by the Strategic Safeguarding group, which has representatives from the Senior Leadership Team and Governors.
- There is a dedicated Governor(s) work in collaboration with the DSL/DDSL for child protection and is appropriately trained.
- A Senior Member of Staff is appointed as Designated Senior Lead for Child Protection.
- There is a training and development plan covering the college community.
- The College has undertaken a prevent Risk Assessment.
- A section s175 Safeguarding Audit is undertaken annually.
- The Policy provides clear direction to all staff to ensure any child protection concerns, referrals and monitoring of actions are handled appropriately.
- The safe recruitment of staff.
- As part of the requirement for staff to undergo regular updated safeguarding training, including in relation to online safety and Generative Artificial Intelligence and for students to be taught about safeguarding, including in relation to online safety, including misinformation and disinformation (fake news) and conspiracy theories) within the Tutorial Programme.
- Safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole college safeguarding approach and wider staff training and curriculum planning.
- Whilst considering the above training requirements, Governing bodies should have regard to behaviour standards for all staff to manage behaviour effectively

to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all students.

- Governing bodies and proprietors should consider the number of and age range of their children, those who are potentially at greater risk of harm, and how often they access the IT system, along with the proportionality of costs versus safeguarding risks.
- Governing bodies and proprietors should review the Filtering and Monitoring Standards and discuss with its staff and service providers what more needs to be done to support College in meeting this standard.

3.3 Further Education Colleges have a statutory duty to assist the local authority with child protection issues and this policy is in line with current national and local policies on child protection, young people and adults at risk.

4. Policy Statement

4.1 South and City College recognises that personal safety is a fundamental precondition for effective and successful teaching and learning and can only be felt in a safe learning environment that promotes well-being, safety and security for all students, staff and visitors. Safeguarding is a core element of all aspects of college activity.

4.2 Safeguarding as defined in Keeping Children Safe in Education September 2025 and is aligned with Working to Safeguard Children December 2023 is:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online (known as extra-familial harm)
- Preventing the impairment of children's mental and physical health or development
- Making sure that children group up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

4.3 The College is committed to ensuring that best practice is adopted when working with all young people and adults at risk, offering them support and protection, and accepts that it has a legal and moral responsibility to implement procedures to provide a duty of care to young people, to safeguard their wellbeing and to protect them from abuse. This Policy therefore supports **all** students enrolled at the College.

4.4 Section 175 of the Education Act 2002 requires local education authorities and the Governors of maintained schools and further education (FE) colleges to *make arrangements* to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children and young people.

4.5 As the guidance sets out in the Equality Act 2010 to school safeguarding, including that schools and colleges, the College will not unlawfully discriminate against students because of their recognised characteristics and consider how to support appropriately and take positive action, where proportionate to deal with disadvantages these student face eg making reasonable adjustments for disabled students and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

4.6 The Prevent Duty requires specific authorities, such as education to help prevent the risk of people becoming terrorists or support terrorism. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes. To fulfil this duty, the College liaises closely with the local area Prevent lead to receive updates regarding local concerns and to refer students of concern to the Channel process. All concerns under the Prevent Duty will be addressed by the Assistant of Student Experience and Workforce Development in collaboration with the Designated Safeguarding Lead and Deputy DSL.

5. Definitions of Abuse

5.1 The Corporation recognises the following as definitions of abuse, neglect and exploitation:

5.2 **Abuse –** Children and young people can be at risk of harm inside and outside of the college, inside and outside of home and online. All staff exercise professional curiosity and receive training on what to look for in the identification of abuse, neglect and exploitation and where they are unsure, they speak to the Designated Safeguarding Team.

5.2.1 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse including where they see, hear or experience its effects. Children maybe 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. Technology is a significant component in many safeguarding and wellbeing issues. Children may be abused by an adult or adults or by another child or children.

5.2.2 There is an emphasis that all staff should be able to reassure victims of abuse and that they are being taken seriously and will be supported, ensuring that children and young people are never made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment. It is important that it is explained that the law is in place to protect them rather than criminalise.

5.3 **Bullying** – Is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can take many forms and includes emotional, physical, racial, sexual, verbal and Cyber.

5.3.1 Bullying someone because of age, race, gender, sexual orientation, disability or gender questioning is not tolerated at the College. Bullying of this nature is also against the law.

5.4 **Harassment** (as defined by Section 26 of the Equality Act 2010) - includes; Unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment because of or connected to one or more of the following protected characteristics: Age, Disability, Gender reassignment, Race, Religion or belief, Sex, Sexual orientation.

5.4.1 The college has a separate policy and procedure for bullying and harassment. Link to Bullying and Harassment Policy

5.5 **Contextualised Safeguarding** - Safeguarding incidences and all behaviours can be associated with factors outside college, and/or can occur between children outside college. Extra familial harms can take a variety of different forms, and children can be vulnerable to multiple harms, including but not limited to sexual abuse, including harassment and exploitation, domestic abuse in their own intimate relationships. (Teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation. All staff need to consider the context within which such incidents and/or behaviours occur. This is known as contextualised safeguarding, which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and or welfare.

5.6 **Child on Child Abuse** - All staff play a vital role in preventing child on child abuse and have received training on how to respond and how to report where they believe a child may be at risk of it. Staff understand intra-familial harms and any necessary support for siblings following incidents.

5.6.1 Children can abuse other children and this is why it is referred to as child on child abuse, it can happen inside and outside of college and online.

5.6.2 Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Child on Child Sexual Violence (rape or assault) and Sexual Harassment (sexual comments, remarks, jokes, online sexual harassment)
- Causing someone to engage in sexual activity without consent, such as causing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting) or youth produced sexual imagery. This is linked to sexual harassment, bullying and even violence. Self-generated images from 'sexting' can also be used later as a form of harassment and abuse known as 'revenge pornography' which involves the distribution (or threat of distribution) of images, without the consent of those depicted, in order to threaten, control, bully, harm or humiliate them.
- Up skirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

5.7 **Child on Child Sexual Violence and Sexual Harassment – c**an occur between two children of any age and sex. It can also 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 (physically and verbally) and are never acceptable. Being subjected to sexual harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. All staff must respond to all signs, reports and concerns, including those that have happened outside of the college premises,

and/or online. All staff should maintain an attitude that 'it could happen here' and be aware of that there is a zero-tolerance approach. It is never acceptable, and it will not be tolerated. All staff should challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. Evidence shows that girls, children with SEND and LGBT children are at greater risk.

5.8 **Sexual violence** is sexual offenses under the Sexual Offense Act 2003:

- Rape: Penetration of the vagina, anus or mouth of another person who has not consented.
- Assault by Penetration: Penetration of the vagina or anus by a part of another person's body or anything else, it is sexual and there is no consent to the penetration and the person carrying out the assault, does not reasonably believe there is consent.
- Sexual assault: When someone intentionally touches another person, and the touching is sexual and not consented to. Staff are to be aware that sexual assault covers a wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breast/genitalia without consent, can still constitute sexual assault.
- Causing someone to engage in sexual activity without consent: Causing someone to engage in sexual activity without consent, such as causing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

5.9 **Sexual harassment** is unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of college such as sexual comments, sexual remarks, sexual jokes, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names. Included in this is also physical behaviour such as deliberately brushing against someone, interfering with someone's clothing.

5.9.1 Online sexual harassment may be standalone or part of a broader pattern of sexual harassment and/or sexual violence. It may include:

- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
- Sharing of unwanted explicit content.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion and threats.
- Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

5.9.2 All inappropriate behaviours between children should be challenged as they are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up', or 'boys being boys' can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

5.10 **Harmful Sexual Behaviour** – HSB can occur online and/or face to face and can also occur simultaneously. This exists on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. The term HSB has been widely adopted in child protection.

5.11 **Stalking** - is a pattern of abusive behaviour designed to incite fear and curtail freedom, such as watching or monitoring someone or forcing contact with them through any means (including via social media). Young women can be particularly at risk of stalking as college and social media can provide a backdrop of monitoring and surveillance which others can easily abuse.

5.12 **Physical abuse** - This may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

5.13 **Emotional abuse -** Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate, or valued only in so far 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, causing children frequently to feel frightened, or the exploitation or corruption of children. It can include over protection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may include serious bullying (including cyber 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 maltreatment of a child, although it may occur alone.

5.14 **Sexual abuse -** This involves forcing or enticing a child, young person or adult at risk 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 penetration (rape or oral sex) or non-penetrative (masturbation, kissing, rubbing and touching outside of clothing). It may also include involving the looking at, or being involved in the production of, sexual images or watching sexual activities, or encouraging the person 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 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 in education and all staff are trained to be aware of it and how to report.

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

5.16 **Discriminatory abuse –** this may include abuse, bullying and harassment based on an individual's age, sex, disability, religion, race, cultural background, sexual orientation or gender reassignment.

5.17 **Financial or Material Abuse -** Financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

5.18 **Child Sexual Exploitation (CSE)** – Is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual (or criminal) activity, may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence, CSE and CCE (child criminal exploitation) can affect children of any gender and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

5.18.1 CSE is a form of child sexual abuse which 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

5.18.2 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

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5.18.4 Some children do not realise they are being exploited and may believe they are in a genuine, romantic relationship.

5.19 **Child Criminal Exploitation (CCE) -** Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

5.19.1 Children become trapped by this type of exploitation, as perpetrators can threaten victims (their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children). Even if the activity appears to be something they have agreed or consented to, they may still have been criminally exploited.

5.19.2 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of CE too. Both boys and girls maybe at a higher risk of sexual exploitation when being exploited criminally.

5.20 **County Lines** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK using dedicated mobile lines or other forms of 'deal line'. Exploitation is an integral part of the county lines offending model, with children and adults at risk, exploited to move and store drugs and money. One of the ways of identifying potential involvement in county lines are missing episodes both from home and college when the victim may have been trafficked for the purpose of transporting drugs and referral to the Safeguarding Team should be made immediately where there is a concern.

5.20.1 All staff should be aware of indicators which may signal that children are at risk or involved with serious violent crime. These may include increased absence from college (unexplained absences may be a safeguarding concern and may need to be referred to children's services), a change in friendships or relationships with older individuals or groups.

5.20.2 A significant decline in performance, signs of self-harm or a significant change in well-being or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs.

5.21 **Honour Based Abuse (includes Female Genital Mutilation and Forced Marriage) –** So called Honour based abuse (HBA) encompasses crimes that have been committed to protect or defend the honour of a family and/or the community, including female genital mutilation, forced marriage and practices such as breast ironing. All forms of HBA are abuse and should be be reported on the college's safeguarding platform, Myconcern/Safeguarding Team.

5.21.1 **Female Genitalia Mutilation (FGM**) - May comprise of 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. There is a legal duty on all staff to personally report to the police where they discover FGM appears to have been carried out on a girl under 18. Those failing to report such cases could face disciplinary action.

5.21.2 **Forced marriage** - A forced marriage is where one or both people do not consent to the marriage. Pressure can include threats, physical or sexual violence and financial pressure. All child marriages are forced because a child cannot provide informed consent and is therefore a violation of children's rights.

5.21.3 The Marriage and Civil Partnership (Minimum Age) Act 2022 states that 16- and 17-year-olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Since Feb 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff to be aware that it is illegal even with no coercion.

5.22 **Domestic Abuse** - can encompass a wide range of behaviours and maybe a single incident or a pattern of incidents. The abuse can be, but is not limited to, violent, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Teen relationship abuse was acknowledged formally in 2013 when the Home Office definition of Domestic Violence was extended to include young people aged 16 and over and awareness of the issue has increased in part

due to the Home Office's targeted campaign This Is Abuse (link to this document can be found in the titles page).

5.22.1 All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

5.22.2 It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage. Domestic abuse affects people of every class, gender, wealth, geography, age, race, disability and sexuality. The abuse can begin at any stage of the relationship and may continue after the relationship has ended. Domestic abuse is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship. If a student discloses that they are in an abusive relationship, we have a duty to offer them support, and /or find the relevant organisation that may be able to help them.

5.22.3 If the student is a child, the information must be shared with a DSL without delay.

5.22.4 If the student is an adult, it is important to establish if they have children under 18. If the victim has young children, a referral may be made to Children's Social Care, with consent from the parent.

5.23 **Children who are Lesbian, Gay, Bi, or Gender Questioning (LGBT) -** The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who are. However, the CASS review identified that caution is necessary for children questioning their gender as there remains many unknowns about the impact of social transition and children may well have wider vulnerabilities eg complex mental health, psychosocial needs. As such when supporting a gender questioning child, caution should be taken in the approach and consider the broad range of their individual need in partnership with the child's parent/care (unless this would constitute a safeguarding risk).

5.23.1 It is vital that staff endeavour to reduce the additional barriers faced and create a safe culture for students to speak out or share any concerns with members of staff, this includes personal tutors and Student Experience

5.24 **Radicalisation and Extremism** – Refers to the process of supporting terrorism and extremist ideologies and, in some cases, to then participate in terrorist activity.

5.24.1 **Extremism** is defined as the vocal or active opposition to fundamental values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

5.24.2 **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence. The College seeks to protect children and young people against the messages of violent extremism, including, but not restricted to those linked to Islamist ideology, or far right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and Extremist Animal Rights Movements. All colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions to have due regard to the need to prevent people from being drawn into terrorism. Staff to be aware that all young people are vulnerable to an extent and that anyone could be affected by grooming (of any sort), radicalisation is an issue to all not just learners at risk.

5.25 **Terrorism** – is an action that endangers or causes serious violence to a person and/or people, cause serious damage to property or seriously interferes or disrupts an electronic system. The use or threat is designed to influence government or to intimidate the public and is made for advancing a political, religious or ideological cause.

5.25.1 The College has in place a Prevent risk assessment, which forms part of the Safeguarding Policy.

5.25.2 The College values freedom of speech, and the expression of beliefs and ideology as fundamental rights underpinning our society. The College's Freedom of Speech Code of Practice includes the Freedom of Expression and Visiting External Speaker Procedure which is linked to this policy.

5.25.3 Designated Safeguarding Team liaise with Multi Agency Safeguarding Hub (MASH) and/or Counter Terrorist Unit (CTU) for advice. If deemed appropriate following advice, a referral can be made to Channel who offer advice and guidance and support with the aim of preventing activity which could be deemed as criminal. The college has built strong links with the West Midlands Regional Prevent Co-ordinator.

5.26 **Online Safety** – Technology is a significant component in many safeguarding wellbeing issues. The breadth of issues classified with online safety is considerable and ever evolving and can have a cognitive and psychological impact on learners. These can be categorised into four areas of risk:

- **Content**: being exposed to illegal, inappropriate, or harmful content eg pornography, misinformation, disinformation (fake news) and conspiracy theories, cyber flashing, epilepsy trolling, encouraging serious self-harm, racism, misogyny, self-harm, antisemitism, radicalisation and extremism.
- **Contact**: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct**: online behaviour that increases the likelihood of causing harm eg making, sending and receiving explicit images eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images including deep fakes (AI generated) and online bullying.
- **Commerce**: online gambling, inappropriate advertising, phishing and or financial scams.

5.27 **Filtering and Monitoring**

5.27.1 The Corporation and ensures that the college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems Students with greater vulnerability should be considered when it comes to tech use, perhaps with different mitigation in place (those with critical thinking processes can be vulnerable).

5.27.2 Filtering and monitoring systems also assess access to and use of generative artificial intelligence (AI) platforms (e.g., chatbots, image generators), ensuring these technologies are not used to generate or share harmful content, bypass filters, or facilitate abusive behaviour.

5.27.3 Senior leaders work closely with Governors and proprietors, the Designated Safeguarding Lead (DSL) and IT service providers in all aspects of filtering and monitoring.

5.27.4 Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The Designated Safeguarding Lead works closely together with the Head of IT (who works closely with IT service providers) to meet the needs of the college.

5.27.5 The DSL takes lead responsibility for safeguarding and online safety, which could include overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

5.27.6 The IT service provider have technical responsibility for:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

5.27.7 To understand and evaluate the changing needs and potential risks of the college, IT review the filtering and monitoring provision, at least annually.

5.27.8 An effective filtering system needs to block internet access to harmful sites and inappropriate content (eg inappropriate or are associated with extremist content). It should not:

- unreasonably impact teaching and learning or college administration
- restrict students from learning how to assess and manage risk themselves

5.27.9 Monitoring user activity on college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software, however, the system will step in if it sees a threat and block access to resources if a the threat is deemed serious. This is especially the case if malicious IP addresses are actively trying to connect to student accounts. If this happens, response plans inform tutors and Student Experience to arrange for support to the learner.

5.27.10 Monitoring allows you to review user activity on school and college devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

5.27.11 The college has a clear online policy and considers the 4Cs above (6.24). The college's Disciplinary procedure is triggered if college devises are used to sexually harass, bully and control others, share indecent images consensually or non-consensually, view and share pornography and other harmful content. SCCB Information Technology Policy v1.4.pdf

5.28 Mental Health

5.28.1 All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect and

exploitation. All staff are well placed to observe children day to day and identify those who behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. However, staff should not attempt to make a diagnosis of a mental health problem.

5.28.2 A number of the college's safeguarding team and Safeguarding Triage are Mental Health First Aiders and are based at each campus. The college's Mental Health Leads are the Designated Safeguarding Lead and Assistant Principal of People and Student Engagement.

5.28.3 The college has invested for a number of years in a 24/7 helpline service available for students to access or be referred to.

5.28.4 Any concerns for a student's mental health and wellbeing should be reported on the college's safeguarding platform, Myconcern.

5.29 Children who are Absent from Education

5.29.1 Children being absent from education for prolonged periods and/or on repeat occasions, can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important that the college's response to unexplainable and/or persistent absences from education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging, but also where children are already known to the local authority children's social care and need a social worker (such as a child who is a child in need or has a child protection plan or is a looked after child). Where being absent from education may increase known safeguarding risks within the family or in the community. Staff are to report incidences on Myconcern and have strategies in place to reengage learners. Where a learner has additional vulnerabilities, such as Care Experienced, has an EHCP, has a social worker etc, close liaison must take place with the Student Experience team.

- Attendance Policy 2024/25

5.30 Cybercrime

5.30.1 Cybersecurity is a core part of online safety. The college protects users and systems from malware, data breaches, and unauthorised access. An effective cyber response plan is in place to manage incidents.

5.30.2 Cybercrime is criminal activity committed using computers and/or the Internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber dependent crimes include:

- Unauthorised access to computers (Illegal hacking).
- Denial of service (attacks or 'booting') - makes computer/network/website unavailable
- Making, supplying, or obtaining malware (malicious software) - such as viruses

5.30.3 The college is committed in meeting the Cybersecurity Standards of Schools and Colleges set by the Government by protecting all devices on every network:

- With a properly configured firewall.
- Network devices are known, correctly configured and up to date.
- Accounts only have the access they require.
- Multi factor Authentication is in place.
- Anti malware is in place.

5.30.4 If there are concerns about a child and Cybercrime, the Designated Safeguarding Lead, or Deputy should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with the regional and local policing. It aims to intervene where young people are at risk of committing or being drawn into low level cyber dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices deals with cyber-dependent crimes which are offences that can only be committed through the use of technology, where the devices are both the tool for committing the crime and the target of the crime. Cyber Choices does not currently cover cyber enabled crimes such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concerns such as online bullying or general online safety.

6. Duty of Care Roles, Responsibilities and Accountability

6.1 The Senior Leadership Team and Governing Body (Corporation)

6.1.1 Governing Bodies have a strategic leadership oversight for the college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must regard the guidance set out in Keeping Children Safe in Education (KCSIE), ensuring policies, procedures and training in their college are effective and comply with the law at all times.

6.1.2 Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the risks from the college's IT system. As part of this process, Governing Bodies and proprietors should ensure their college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system, along with the proportionality of costs versus safeguarding risk.

6.1.3 The College will refer concerns that a child or young person might be at risk of significant harm to the Birmingham Department for Children (Children's Trust), Young People and Families Directorate, Adult and Communities Directorate or the relevant Local Authority Department for those who live in a different area.

6.1.4 The Corporation has agreed that a Governor(s) will be Champion(s) for safeguarding issues. All Governors will receive appropriate safeguarding training and child protection (including online) training at induction and then at regular intervals. The training provides them with the knowledge to ensure the college's safeguarding policies and procedures are effective.

6.1.5 As set out in the Office for Students statement of expectations for preventing and Addressing Harassment and Sexual Misconduct Affecting students in Higher education, the Corporation ensures that the College's approach to harassment and

sexual misconduct is effective. It ensures that risks relating to these issues are identified and effectively mitigated.

6.1.6 All staff working with children, young people and adults at risk will receive training and regular updates to familiarise them with safeguarding issues and the College's procedures and policies, with refresher training at least every 3 years but has annual KCSIE updates.

6.1.7 The Corporation will receive from the designated senior member of staff with lead responsibility for safeguarding, an annual report which reviews how the duties have been discharged.

6.2 Designated Governor(s) for Safeguarding

6.2.1 The designated Governors liaise regularly with the senior management team to ensure that they have a clear overview of all safeguarding/child protection and Prevent matters:

- Ensuring that the College has procedures and policies which are consistent with the Local Safeguarding Children's and Adult Board's procedures.
- Ensuring that the Corporation annually reviews the College's safeguarding policy.
- Ensuring that the Corporation is annually informed of how the College and its staff have complied with the policy including, but not limited to, a report on the training that the staff have under taken.

6.2.2 The Governor is the contact person for liaison between agencies such as the police and social care in connection with allegations against the Principal or 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.

6.2.3 To assist in these duties, the Governor(s) shall receive appropriate training along with attendance at the annual Safeguarding Development Day.

6.3 Senior Staff Member with Lead Responsibility (Designated Safeguarding Lead)

6.3.1 The Designated Safeguarding Lead has lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holders job description.

6.3.2 The Designated Lead for Safeguarding and Child Protection is supported by the Deputy Designated Lead (trained to the same standard as the DSL) and a team of Safeguarding Officers who are also responsible for Safeguarding Procedures. The team have a key responsibility for raising awareness of issues relating to the welfare of children, young people and adults at risk, and the promotion of a safe environment for all students within the College. The Student Experience triage team support early help interventions and work closely with the designated safeguarding officers.

6.3.3 DSL/DDSL have responsible for reporting deficiencies in procedure or policy identified by the Local Safeguarding Children's and Adult Boards to the Corporation at the earliest opportunity. Areas of responsibility includes:

- Being available during college hours to discuss concerns (this can include by phone, Teams or any other appropriate media)

- Overseeing the referral of cases of abuse and neglect to local authorities, the Channel programme, to the Disclosure and Barring Service, police etc.
- Providing advice and guidance to the Safeguarding Team, parents and staff
- Ensuring that child protection files are kept up to date
- Ensuring appropriate safeguarding training, knowledge and skills is in place for all staff, particularly the Deputy Designated Lead and Officers.
- Providing an annual report for the Senior Management Team and College Corporation
- Attending refresher training at least every 2 years
- Understand the importance of information sharing, both within the college and within the colleges on transfer, included in year and between colleges, and with safeguarding partners, other agencies, organisations and practitioners.
- Has overall responsibility for the Safeguarding and Child Protection Policy.

6.4 Safeguarding Team (Triage)

6.4.1 The Safeguarding Team have received training in Safeguarding issues and inter-agency working, as required by the Birmingham Safeguarding Children's (Children's Trust) and Adult Boards and will receive refresher training at least every 2 years. They are required to keep up to date with developments in Safeguarding issues and be responsible on a day-to-day basis for:

- Providing advice and support to other staff on issues relating to safeguarding procedures.
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral).
- Ensuring that parents or carers of students within the College are aware of the College's Safeguarding Policy.
- Liaising with Birmingham Children, Young People and Families Department, Adult and Communities Directorate or relevant Local Authority for the person's address, and other appropriate agencies.
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils.
- Liaising with employers and training organisations who receive students from the College on long term placements to ensure that appropriate safeguards are put in place.
- Will be accountable to the senior member of staff with lead responsibility.
- Will know how to make an appropriate referral to the Birmingham Safeguarding Children Board, Adult and Communities Directorate or the relevant Local Authority for the person's address.
- Will be available for consultation and be able to provide advice and support to other staff on issues relating to safeguarding.
- Will provide supervision for staff in their division who act as a referral point for welfare and safeguarding concerns.
- Will have suitable skills for listening to children, young people and adults at risk studying at the College.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Will have received training in child protection issues and inter-agency working, as required by the Birmingham Safeguarding Children's and Adult Board and will receive refresher training at least every 2 years.
- Will have the ability to record appropriately.
- Will ensure that the person and the member of staff involved in the procedure are aware of the support provided by the Colleges Safeguarding Officer and do not compromise any potential or actual investigation.

6.4.2 **The Designated Safeguarding team 2025/26 comprises:**

- Donna Kelly - Designated Lead – Executive Director of Student Experience
- Stephen Hall - Deputy Designated Lead – Safeguarding & Positive Behaviour Manager
- Amal Cadow - Deputy Designated Lead – Safeguarding & Positive Behaviour Manager
- Claire Brooks – Safeguarding Officer – AP People and Student Engagement
- Bernard Thompson - Safeguarding Officer - DD Student Experience
- Leanne Dixon - Safeguarding Officer - DD Student Experience
- Jeannie Christina - Safeguarding Officer - AD Student Experience
- Audrey Bathley – Safeguarding Officer – AD Student Experience
- Steven Dale – Safeguarding Officer – AD Student Experience
- Cassandra Dockery-Pirouzi – Safeguarding Officer – Head of School
- Ann-Marie Mason – Safeguarding Officer – Deputy Faculty Head
- Elizabeth Beard – Safeguarding Officer – Nursery Manager

6.5 All Staff

6.5.1 All staff are responsible for ensuring they are familiar with, and understand their responsibilities contained within the statutory guidance set out in 'Keeping Children safe in Education' September 2025 and the wider college policies and procedures in relation to student welfare and safety. All staff **must** read at least part one of 'Keeping Children Safe in Education' 2025 and be aware of and understand their responsibility concerning keeping children and young people safe.

6.5.2 All staff should be aware of systems within the college which support safeguarding, and these should be explained as part of the staff induction which includes:

- Safeguarding and Child Protection Policy
- Positive Behaviour Policy
- Bullying and Harassment Policy and Procedure
- External Speakers Procedure
- Trips and Visits Procedure
- Prevent Risk Assessment
- Disciplinary Policy
- Attendance Policy
- Staff Code of Conduct (include low level concerns, allegations against staff and whistleblowing).
- Safeguarding response to children who are absent from education, particularly unexplainable and/or persistent absences (unexplained absences may be a safeguarding concern and may need to be referred to children's services). Staff should be clear on what action to take when this occurs.

6.5.3 All staff should receive appropriate safeguarding and child protection training (including online safety which will include an understanding of the expectations, applicable roles and responsibilities in relation to monitoring and filtering at induction). Staff should receive regular updates as required and at least annually.

6.5.4 All staff are required to report a concern on the college's safeguarding platform, Myconcern. Reports must be submitted on the same day. If there is immediate risk of harm, staff must report the concern immediately. All staff to know who the

safeguarding team is and are aware of the college's early help process and understand their own role in this.

6.5.5 Any child may benefit from early help and all staff should be alert to the potential need for early help for a child who has a disability, has a physical or mental health condition and/or a specific additional need, is young carer, is care experienced, has a parent or carer in custody, is (frequently) missing from education, home or care, has experienced multi suspensions, is at risk of being permanently excluded etc

6.5.6 All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. The victim should never be given the impression that they are creating a problem by reporting any form of abuse and or neglect. Nor should a victim ever be made to feel ashamed for making a report. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interest of the child.

6.5.7 Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate support. DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Lead or Deputy.

6.5.8 Any concerns and/or a disclosure made about a member of staff, this must be reported to the Safeguarding Officer responsible for HR

6.6 Care Experienced Learners Children in Care (CiC), Care leavers

6.6.1 Students who are in care or are leaving care are a particularly vulnerable cohort and should be identified, monitored and supported throughout their time in college. The most common reason for children being looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

6.6.2 A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children who are a particularly vulnerable group.

6.6.3 A member of the Student Experience team is notified immediately if a student is identified to be in care or leaving care and has not yet been identified as such. Each care experienced learner is allocated a Mentor (who is a fully trained member of the Safeguarding Triage Team and Mental Health First Aider). Tutors work closely with mentors, particularly if there are concerns eg around non-attendance (unexplained absences may be a safeguarding concern and may need to be referred to children's services) or change in behaviour.

6.7 Learners aged 14-16

6.7.1 The College will identify staff with a specific responsibility to monitor the wellbeing of all 14-16s to ensure communication with the relevant school/parent/carer and local authority take place regarding unexplained absence or other concerns. All staff are trained to report any concerns immediately on the college's safeguarding platform, Myconcern. The Interim Head of 14-16 Provision is also the Designated Safeguarding Officer and monitors the 14-16 Safeguarding Triage.

6.8 Learners with Special Educational Needs, Disabilities or Health issues

6.8.1 Children/young people with additional needs (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Staff to be aware that Hate Crime can occur against people with disabilities and 'Mate' Crime, where people pretend to be a friend while secretly stealing from or abusing them. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relates to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying, including prejudice-based bullying than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding, being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in college
-

6.8.2 Any reports of abuse involving children with SEND will therefore require close liaison with the Designated Safeguarding Lead or Deputy and the Campus Assistant Director (SENCO) of Student Experience.

6.8.3 Where concerns occur, students are supported by Safeguarding Triage members (Learning Support Co-ordinators/Mentors/Welfare officers).

6.9 Multi-Agency Work

6.9.1 Colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the college contributes to multi agency working in line with the statutory guidance within Working Together to Safeguard Children which was updated December 2023 to emphasise that successful outcomes for children depend on strong multi-agency partnership across the whole system of help.

6.9.2 Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the change of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later and is particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. The DSL/DDSL/DSO's know what the local early help process is and how and where to access support. Lucy Faithfull Foundation 'Shore Space'

6.9.3 The College works in partnership with other agencies in the best interests of the students and the College, where necessary, liaise with external agencies and make referrals to Children's/Adult Services or the Police.

6.9.4 Information sharing is a key component of Multi Agency Working; the College recognises that there can be significant consequences to not sharing information. The Data Protection Act 2018 and UK GDPR is not a barrier to sharing information and in cases where a crime is suspected, or there is a risk to immediate harm then we have a legal duty to do so. At all levels staff should ensure they seek advice from MIS/and or a safeguarding officer when being asked to provide information on a student(s) to an external people or agencies. The college is committed to keeping students safe, both in college and the wider community. As part of our safeguarding arrangements, we have a two-way information sharing agreement in place with West Midlands Police. The agreement is compliant with **Crime & Disorder Act 1998**, **Data Protection Act 2018 – 2021 Update** and **United Kingdom General Data Protection Regulation (UK-GDPR)**; and focuses on preventing young people from becoming involved, or further involved, in crime and anti-social behaviour, as either a victim or offender.

6.9.5 The College will cooperate with any child protection enquiries conducted by Children's Services: The College will ensure representation at appropriate inter-agency meetings such as integrated support plan meetings, initial and review child protection conferences and core group meetings.

7. Confidentiality and Information Sharing

7.1 The College has due regard to DPA and UK GDPR. DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Lead or the Deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

7.2 All concerns, discussions and decisions made, and the reasons for those decisions should be recorded in writing. This will also help if and when responding to any complaints about the way a case has been handled by the college. Information should be kept confidential and stored securely. It is good practise to keep concerns and referrals on the College's Safeguarding Platform, Myconcern. A record should include:

- a clear and comprehensive summary of the concern
- details of how their concerns was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

7.3 If in doubt about recording requirements, staff should discuss with the designated safeguarding lead or deputy.

8. Reporting and dealing with safeguarding allegations made against members of staff

8.1 Appropriate whistleblowing procedures are in place for such concerns to be raised with the Clerk to the Corporation.

8.2 Where a staff member is able to raise an issue, the complaint will be dealt with under the Grievance Procedure. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistle blowing channels are open to them. Some examples of allegations may be:

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

8.3 There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child.
- Investigating and supporting the person subject to the allegation. The case manager should discuss with the LADO the nature, content and context of the allegation and agree a course of action.

8.4 Before contacting the LADO. Colleges should conduct basic inquiries in line with local procedures, to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

8.5 The College recognises that an allegation of 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 those investigations are thorough and not subject to delay.

8.6 The College recognises that the welfare of the child, young person or adult at risk is of 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 the College will do so with sensitivity and will act in a careful, measured way.

8.7 If staff have a safeguarding concern, or an allegation is made about another member of staff (including agency, volunteers and contractors) harming or posing a risk of harm to children then the college procedure needs to be accessed.

8.8 If students have a safeguarding concern or allegation about a member of the safeguarding team, they can report as follows:

- Concerns or allegations about the Safeguarding Triage team should be reported to the Designated Safeguarding Lead (DSL)
- Concerns or allegations about a Safeguarding Officer, Deputy Designated Safeguarding Lead or the Designated Safeguarding Lead should be reported to the Assistant Principal of People and Student Engagement
- Concerns or allegations about the Assistant Principal of People and Student Engagement (Designated Safeguarding Officer) should be reported to the Deputy Principal.

9. Sharing low level concerns (do not meet the harm threshold)

9.1 The term low level concern does not mean that it is insignificant. A low level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a nagging doubt that an adult working in or on behalf of the college may have acted in a way that:

- is inconsistent with the college's code of conduct, including inappropriate conduct outside of work
- it doesn't meet the threshold of harm or is not considered serious enough for the college to refer to the LADO.

9.2 Examples of such behaviour could include, but are not limited to:

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.

9.3 Low level concerns about agency, contractors etc should be notified to their employer.

10. Reporting safeguarding concerns

10.1 All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and or neglect. Nor should a victim ever be made to feel ashamed of making a report.

10.2 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and or they may not recognise their experiences harmful. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead they have concerned about a child. It is also important that staff determine how best to build trusted relationships with children and young people, which facilitate communication.

10.3 All staff should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the college premises and/or online. All staff working with children are advised to maintain an attitude of it 'could happen here' and this is especially important when considering child on child abuse.

11. Safer Recruitment

11.1 The college pays full regard to Keeping Children Safe in Education (updated September 2025), Part 3 Safer recruitment practice and has safer recruitment and selection procedures. These are reviewed to ensure that they take account of the following:

- Robust recruitment and selection process – this should deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in the college. To ensure that at any persons conducting the interview has completed safer recruitment training.
- Application forms – a statement includes in the application form to state to applicants that it is an offense to apply for the role if the applicant is barred from engaging in regulated activity relevant to children. A CV should only be

accepted alongside a full application form and is not sufficient on its own to support safer recruitment.

- Shortlisting – Candidates are asked to complete a self-declaration of their criminal record or information that makes them unsuitable to work with children and young people. In addition, as part of the shortlisting process, colleges should consider carrying out an online search as part of their due diligence on the short-listed candidates. This may help identify any incidents or issues that have happened and are publicly available online which the college might want to explore with the applicant at interview. Colleges should inform shortlisted candidates that online searches may be done as part of the Due Diligence checks.
- Employment history and references – references are obtained before interview, where possible, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview. Employment cannot commence without at least one reference from recent employer
- Selection – interviews should be used to explore potential areas of concern and to determine the applicant suitability to work with children. Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.
- Pre-appointment vetting checks, regulated activity and recording information - It is important to ensure that the correct pre appointment checks are carried out. To identify whether a person may be unsuitable to work with children and young people. All offers should be conditional until satisfactory completion of the mandatory pre-employment checks take place as well as verifying A candidate's identity and Enhanced DBS (Disclosure and Barring Service) checks for those who will be engaging in regulated activities with children should take place. A separate children's barred list check to be obtained if an individual is to start work in regulated activity with children before the DBS certificate is available. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.

12. Use of College Premises for non-college Activities (in out-of-college settings)

12.1 Where the college hires or rents out college facilities or premises to organisations or individuals eg to community groups, sports associations, and service providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep children safe as described in the Government's Keeping Children Safe in Out of School Settings.https://www.gov.uk/government/publications/guidance-for-parents-and-carers-on-safeguarding-children-in-out-of-school-settings/using-after-school-clubs-tuition-and-community-activities

12.2 When services or activities are provided by the College under the direct supervision or management of its staff, arrangements for child protection will apply. However, where services or activities are provided separately by another body, this is not necessarily the case. College staff should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed and ensure that there are arrangements in place for the providers to liaise with the College on these matters where appropriate. This applies regardless of whether or not the students who attend any of these services or activities are enrolled at college. The college should also ensure safeguarding requirements are included in any transfer of control agreement ie lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.

12.3 **Organisations or Individuals using College Premises**

12.3.1 Colleges may receive an allegation relating to an incident that happened when an individual or organisation was using the college premises for the purposes of running activities eg community groups, sports associations or service providers that run extracurricular activities. As with any safeguarding allegation, this should be reported to the Designated Safeguarding Lead and/or Deputy and/or Officers whereby the college's safeguarding procedures will be followed. It may be necessary for the Safeguarding team to inform the LADO.

13. Related Documents

- Acceptable Users Policy – refer to SCCB Information Technology Policy v1.4.pdf which contains links to Acceptable Use Policies.
- Additional Learning Support Policy 2023.24
- Attendance Policy 2024/25
- Bullying and Harassment Policy
- Concerns about phishing
- Controlling or Coercive Behaviour Statutory Guidance Framework April 2023
- Criminal Convictions policy
- Early Help System Guidance
- Equality Strategy
- External Speaker & Event Policy
- Find your local IAS service & Council for Disabled Children
- For further information in keeping children with SEND, or health issues: SEND code of practice 0 to 25 years
- For info around children absent from education. Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges
- Freedom of Speech Code of Practice Including Freedom of Expression Policy
- Guidance for Handling Disclosure of Abuse and Procedure for Reporting Concerns, including how to report on MyConcern
- Guide on definition of Domestic Violence
- Health and Safety Policy
- Information Sharing: HM Government.
- KCSIE
- Mandatory Reporting of Female Genital Mutilation - Procedural Information 2020
- MENCAP
- Mental health support by NHS
- Multi – Faith Rooms
- Multi-agency statutory guidance on female genital mutilation
- MyConcern Link
- Positive Behaviour Policy
- Positive Behaviour Strategy
- Prevent duty guidance: England and Wales (2023) Updated 6 March
- Public Interest Disclosure Policy (Whistleblowing)
- RSHE Statutory Guidance
- SENDIASS
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Staff booklet 'Be Sure Be Safe'
- Staff Code of Conduct Policy

- Staff Disciplinary Policy
- Student Contract
- Student Disciplinary Policy
- Student Harassment, Sexual Misconduct & Relationship Abuse Policy
- Trips and Visits Procedure
- VRU – violence against young women
- What to do if you're worried a child is being abused, Advice for Practitioners 2015
- Working Together to Safeguard Children 2023: Summary of Changes

14. Effective Date

The policy is to be effective from August 2025.

15. Approval

This policy was approved by Senior Management in September 2025 and re-approved following amendments in April 2026.

16. Policy Change History

Version	Date	Description of changes made	Changed by:
23	August 2025	Annual review includes updates from KCSIE Sept 2025 and links updated	Executive Director Student Experience
24	April 2026	i) 5.28.2 Clarification that Mental Health First Aiders are based at each campus. ii) 6.5.4 Added clarification that safeguarding concerns must be reported on the same day or immediately if there is a risk of immediate harm iii) 8.8 Added guidance outlining escalation routes for students who wish to report concerns or allegations about members of the safeguarding team iv) All references to the role of Senior Executive Director have been amended to Assistant Principal	Executive Director Student Experience