



Safeguarding

Policy and Procedures - Incorporating Child Protection 2025-2026

Head of Safeguarding and EDI

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1. Introduction

- 1.1 City of Wolverhampton College acknowledges the duty of care to safeguard and promote the welfare of students, apprentices and staff and is fully committed to ensuring safeguarding practice reflects statutory responsibilities and Government guidance.
- 1.2 The College is committed to maintaining procedures and practices which safeguard and promote the welfare of all students, apprentices and staff by ensuring the Safeguarding Policy and Procedures meet the requirements set by the Department for Education's statutory guidance for colleges, 'Keeping Children Safe in Education' (KCSiE).
- 1.3 Keeping Children Safe in Education 2025 update which came into force on 1st September 2025, defines safeguarding and promoting the welfare of children as:
 - 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
 - Preventing the impairment of children's mental and physical health or development
 - Ensuring that children grow up in circumstances consistent with providing safe and effective care
 - Taking action to enable all children to have the best outcomes.
- 1.4 Children include everyone under the age of 18.

2. Purpose

- 2.1 The purpose of the Safeguarding Policy and Procedures are:
 - To protect students and apprentices who study at the City of Wolverhampton College from harm
 - To provide staff, volunteers, employers, contractors, students, apprentices and their families with the overarching principles guiding our safeguarding approach.
- 2.2 The Safeguarding Policy and Procedures recognise that the welfare and interests of students, apprentices and staff are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation, or socioeconomic background, all students, apprentices and staff have a positive and enjoyable experience at the City of Wolverhampton College in a safe and welcoming environment.
- 2.3 The College acknowledges that some students and apprentices, including those with a disability, those from ethnic minority communities or lesbian, gay, bi or trans (LGBT), can be particularly vulnerable to abuse, and the College accepts the responsibility to take reasonable and appropriate steps to ensure their welfare.

2.4 All staff will, through training and induction, know how to recognise indicators of abuse, respond to a student or apprentice's disclosure, and record and report this information. Staff will not make promises to any student or apprentice, and staff will not keep secrets. Once a student or apprentice chooses to disclose information that puts them at risk of harm, they should know what actions staff may need to take in response. All staff will be trained to recognise that a student or apprentice 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 as harmful.

3. Scope

- 3.1 The Safeguarding Policy and Procedures are mandatory for everyone involved in the City of Wolverhampton College. Failure to comply with the policy and procedures will be promptly addressed and may result in dismissal or exclusion from the organisation.
- 3.2 This applies to anyone working for the City of Wolverhampton College, including Governors, Senior Managers, Volunteers, Agency staff and college-employed apprentices.
- 3.3 Safeguarding and promoting the welfare of students and apprentices is everyone's responsibility. Everyone who encounters students, apprentices, and their families has a role to play. To fulfil this responsibility effectively, all staff should ensure their approach is student and apprentice-centred. This means that they should consider, at all times, what is in the best interest of the student or apprentice.
- 3.4 All staff have a responsibility to safeguard students, but those in regulated activity roles have specific responsibilities and training requirements.
- 3.5 Regulated activity refers to specific roles and responsibilities that involve close, unsupervised contact with children or vulnerable adults. These activities are closely monitored due to the potential risk of harm or abuse and require specific safeguarding procedures, including Enhanced DBS checks.
- 3.6 In a college setting regulated activity constitutes work in a "specified place" with opportunity for contact with children, which can include anyone up to the age of 25 with an Education, Health and Care Plan (EHCP). This includes roles where staff regularly work within the College (a specified place) and have the potential for unsupervised interaction with students.
- 3.7 It is a criminal offence for a barred individual to engage in regulated activity, and for employers to knowingly employ a barred person in such roles.
- 3.8 As roles have the potential for close, unsupervised interaction with children or vulnerable adults the College therefore requires enhanced safeguarding measures and DBS checks.

3.9 Types of regulated activity include:

- Teaching and instruction: This includes teachers, trainers, and assessors, who directly interact with students in a teaching capacity.
- Supervision and care: This includes roles that involve supervising or caring for students, such as support workers, sports coaches, and those involved in extracurricular activities.
- Personal care: This includes staff who provide personal care (washing, dressing, toileting, etc.) to students due to age, illness, or disability.
- Certain healthcare roles: Healthcare professionals or those supervised by them who provide healthcare to students.
- Handling money: Staff who handle money or financial transactions for students.
- Conveying students: Drivers and assistants who transport students to and from activities, particularly those related to healthcare, personal care, or social work.

4. College arrangements

4.1 City of Wolverhampton College believes that:

- Students and apprentices should never experience any abuse, neglect or exploitation
- All staff have a responsibility to provide a safe environment in which students and apprentices can learn.

4.2 City of Wolverhampton College will ensure that:

- Ways of reporting or seeking help will be widely known by students and apprentices and will always be accessible
- All staff are prepared to identify students and apprentices who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a student's or apprentice's life
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- Safer recruitment, selection and pre-employment vetting of staff and volunteers is conducted in accordance with Safer Recruitment and Selection Policy.
- Robust safeguarding arrangements and procedures are in operation and reviewed on an annual basis
- Physical security, statutory compliance, including Martyn's Law and Safety, Health, Environment, and Fire considerations, shall be proactively managed in accordance with the Health and Safety Management Systems
- Robust arrangements for filtering and monitoring College devices and networks are in operation and reviewed at least annually. These arrangements are supported by the ICT Social Media Policy and proactive engagement with learners regarding appropriate use of IT systems.

4.3 The College's Governing Body will ensure:

- A Governor is appointed and is designated to take lead responsibility for safeguarding and child protection
- The Chair of the Board of Governors/designated Governor is responsible for liaising with the Local Authority Designated Officer (LADO) and partner agencies in the event of allegations of abuse being made against the Principal
- A member of the College's Executive Management Team (EMT) is assigned as the College Designated Safeguarding Lead
- The College has Safeguarding Policy and Procedures in place that is in accordance with statutory guidance provided by the Department for Education 'Keeping Children Safe in Education 2024'
- The College operates safer recruitment, selection and pre-employment vetting of staff and volunteers and is conducted in accordance with College policy
- The College has fair and robust procedures in place for dealing with allegations of abuse against staff and volunteers
- The College identifies those who are suffering or likely to suffer significant harm or who are at risk of radicalisation
- The College ensures all staff are appropriately trained to discharge their duties concerning safeguarding
- The College works with Social Care, Police, Health Services and other services to promote the welfare of students and apprentices and protect them from harm
- The College allows access to children's social care from Wolverhampton local authority and, where appropriate, from a placing local authority for that authority to conduct or to consider whether to conduct a section 47 assessment
- Where services or activities are provided on the College premises by another body, the body concerned has appropriate safeguarding policies and procedures and liaises with the College on these matters where appropriate.

4.4 The College's Designated Safeguarding Lead is responsible for:

- Safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- Keeping up to date through regular diarised meetings with the Head of Safeguarding; including oversight of safeguarding referrals and individual cases, awareness of and serious cases and sector developments
- The appointment of a Deputy to support in duties, where required
- Ensuring ways of reporting or seeking help are widely known by students and apprentices and are accessible
- Referral of all cases of suspected abuse to local authority Social Care Services as required
- Referral of all cases to Prevent where there is a radicalisation concern as required.
- Referral of all cases where a person is dismissed or left due to risk or harm to a child to the Disclosure and Barring Service as required
- Referral of all cases where a crime may have been committed to the Police as required

- Maintaining detailed, accurate, and secure written records of concerns and referrals, while monitoring trends and taking action as needed to address them.
- Liaison with the Principal to inform of issues, especially ongoing enquiries under section 47 of the Children Act (1989) and police investigations
- Lead and support the Principal and Head of Human Resources when dealing with allegations against staff
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding when deciding whether to make a referral by liaising with relevant agencies
- Ensuring the Safeguarding Policy and Procedures are reviewed annually, working with Governors to approve, and are published
- Liaising with schools and academies to ensure safeguarding concerns have appropriate arrangements in place to support when students or apprentices transfer to the College
- Liaising with employers and training organisations supporting long-term work placements to ensure appropriate safeguards are implemented
- Ensuring staff receive training in safeguarding and are aware of the College Safeguarding Policy and Procedures
- Working in partnership with the Local Authority and Wolverhampton Safeguarding Together (WST) and other appropriate agencies
- Providing an annual Safeguarding Report to Governors outlining how the College has discharged its duties. Where necessary, report deficiencies in procedure or policy identified by the WST (or others) at the earliest opportunity.

4.5 The College Safeguarding Team are responsible for:

- Dealing with safeguarding cases, including attending case conferences, core group meetings and review meetings as appropriate
- Ensuring that all cases are picked up within a 24-hour timeframe and addressed efficiently.
- Making appropriate safeguarding referrals to the Multi-Agency Safeguarding Hub (MASH) or Police
- Providing support and liaising with staff for any safeguarding concerns within college opening hours.
- Outside of college hours, operating a communications protocol to be able to respond to any emergency.
- Consistently being available to actively listen to students and apprentices and assist them in articulating their concerns and issues.
- Proactively engaging with internal and external training and linking with external organisations to assure currency.

4.6 All College staff must:

- Report all matters via the referral system or advise the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, a member of the Safeguarding Team or the Principal relating to any safeguarding issue or concern
- Complete training as legislation changes and complete refresher training every three years.
- Be responsible for any external visitors, in line with the SHEF Management Manual.

4.7 City of Wolverhampton College recognises that:

- Staff have a responsibility to provide a safe environment in which students and apprentices can learn and work.
- All staff must complete mandatory safeguarding training as required. A refresher must be undertaken every two years. All staff must read and understand updates to KCSiE as they are published.
- Staff should be prepared to identify students or apprentices who may benefit from early help. Early Support and Family Help (formally Early Help) means providing support as soon as a need emerges
- Any staff member concerned about a student's or apprentice's welfare should follow the referral processes set out in this policy
- Staff understand their roles and responsibilities regarding safeguarding and will be provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to students or apprentices
- Staff will first discuss any potential safeguarding referral with the Safeguarding Team about a student's or apprentice's welfare
- If required, staff will be supported to make an appropriate referral to the Wolverhampton Multi-Agency Safeguarding Hub (MASH), Police or any other external relevant agency
- Staff are expected to support Social Workers and other Agencies following any safeguarding referral
- Staff should be particularly alert to the potential need for early help for a student or apprentice who:
 - is disabled and has specific additional needs
 - has special educational needs (whether they have a statutory EHCP)
 - is a young carer
 - has a mental health need
 - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - unexplainable and/or persistent absences
 - has experienced multiple suspensions and is at risk of being permanently excluded
 - is at risk of modern slavery, trafficking or sexual and /or criminal exploitation.
 - is at risk of being radicalised or exploited
 - has a parent or carer in custody or is affected by parental offending

- is a family circumstance presenting challenges for the student/apprentice, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is “care experienced” and/or are currently “children looked after” (CLA) and those in kinship care
- has returned home to their family from care
- is at risk of so-called ‘honour’ based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

4.8 At the College, we understand the importance of working in a way that adheres to the following legislation and statutory guidance:

- The Human Rights Act 1998
- Keeping Children Safe in Education 2024
- Working to Safeguard Children 2023
- Equality Act 2010
- Public Sector Equality Duty

This means we do not unlawfully discriminate against students and apprentices because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity or sexual orientation (protected characteristics).

4.9 All staff should be aware that students or apprentices can abuse each other (often referred to as peer-on-peer abuse or child-on-child abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) (See Bullying and Harassment Policy and Procedure)
- 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)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)
- upskirting, 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 and

- 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)

4.9.1 Child-on-child abuse (Peer-on-Peer abuse) tends to be more prevalent amongst boys than girls and often manifests itself differently. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

4.9.2 Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risk than others. SEND or LGBT students and apprentices are more likely to be victims of these types of abuse.

4.10 A proactive approach is essential to prevent students or apprentices from coming to harm, identifying patterns and following up on potential issues that could lead to safeguarding concerns. Key elements include:

4.10.1 Standards of acceptable and expected behaviour are outlined to all learners as part of their induction, backed up by the Student Positive Behaviour Policy.

4.10.2 Students take part in cross college activities promoting safety, throughout the academic year.

4.10.3 Students access online and face to face tutorial sessions

4.10.4 Skilled and trained designated safeguarding staff support wider staff training and awareness events

4.11 All staff should be aware of indicators which may signal that a student or an apprentice is at risk from or is involved with serious crime. These may include:

- cases of increased absence from college
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in well-being
- signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that students/apprentices have been approached by, or are involved with, individuals associated with criminal networks or gangs.

4.12 All staff need to be aware that mental health problems can, in some cases, be an indicator that a student or apprentice has suffered or is at risk of suffering abuse, neglect or exploitation.

4.13 Where children have suffered abuse, neglect, exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these experiences can impact a student's or apprentice's mental health, behaviour, and education.

4.14 Staff should not attempt to diagnose a mental health problem. If staff identify a student or apprentice whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, they should discuss their concerns with the Safeguarding Team.

5. Named Contact Details (internal)

Name	Title	Contact Details
Peter Merry	Designated Safeguarding Lead Deputy Principal and Chief Executive	07733 625477 merryp@wolvcoll.ac.uk Out of hours: MS Teams
Anil Sharma	Deputy Designated Safeguarding Lead Head of Safeguarding and EDI Lead for out of hours support	01902 317575 / 07534 558517 sharman@wolvcoll.ac.uk
Jas Bhangi	Safeguarding Officer	01902 317696 / 07534 558510 bhangij@wolvcoll.ac.uk
Dandol Juman	Safeguarding Pastoral Support	01902 317696 / 07534 558752 jumand@wolvcoll.ac.uk
Colin Perrin	Safeguarding Pastoral Support	01902 821122 / 07534 558514 perrinc@wolvcoll.ac.uk
Mary Carter	Head of Human Resources For allegations against staff only	01902 821230 / 07919 111518 carterm@wolvcoll.ac.uk
Dionne Barrett	Designated Safeguarding Governor	barrettd@wolvcoll.ac.uk

6. Named Contact Details (external)

Contact	Details
Local Authority Safeguarding Officer (LADO) Kelly Matthews	Wolverhampton City Council Priory Green Office Whitburn Close Pendeford Wolverhampton WV9 5NJ LADO@wolverhampton.gov.uk 01902 550477 Secure ✉ LADO@secure.wolverhampton.gov.uk

Contact	Details
<u>Multi-Agency Safeguarding Hub (MASH)</u>	<p>To report any concerns about a child's safety or well-being contact 01902 555392.</p> <p>Early Help and Social Care staff in MASH will carry out a range of information checks to see what additional information is in partners' files to ensure the best possible picture of the family is used to inform decisions about keeping children safe and the sort of help and support the family might need.</p> <p>Remember, if you aren't sure whether or not to call the MASH, do it: always do something rather than nothing!</p> <p>The experienced staff at the MASH will be more than happy to discuss your concerns and help you decide on the best course of action.</p> <p>Once a telephone referral has been made, the staff member must complete and submit the Multi-Agency Referral Form to MASH within 24 hours.</p> <p>If you have any technical problems completing the online Multi-Agency Referral Form (MARF), don't hesitate to contact MASH at 01902 555392 for advice.</p> <p>Out of hours please call Emergency Duty Team on 01902 552999. Please note this number is for <u>urgent matters only</u>, where an adult or a child is at immediate risk. Should you fear for someone's safety, then please call 999</p>
Police Central Referral Unit	0345 1135 000 or if immediate action is needed  999
CTU Police Haroon Akhlaq (Rooney)	<p>West Midlands CTU West Midlands Police 07393142188 haroon.akhlaq@west-midlands.pnn.police.uk</p> <p>If immediate action is needed  999</p>
Prevent & Cohesion Co Ordinator Deborah Smith	07870407063 Deborah.Smith@wolverhampton.gov.uk

7. Safeguarding Procedures

- 7.1 This section provides guidance for staff on how to respond when a student or apprentice discloses possible abuse. It is important to note that matters relating to the application or enrolment of individuals with criminal convictions fall outside the scope of these procedures. Such disclosures are managed through the College's established Criminal Convictions Procedures.
- 7.2 Separating these processes ensures that safeguarding guidance remains focused on responding to disclosures and protecting students, while application and enrolment matters are addressed through the appropriate administrative channels. This distinction supports clarity, consistency, and compliance with statutory responsibilities.

7.3 How to respond if a student or an apprentice tells you about possible abuse:

7.3.1 If a student or apprentice has suffered or is likely to suffer harm, contact a member of the Safeguarding Team, Designated Lead or Deputy; see Annex B for procedure flowchart.

7.3.2 When a student or an apprentice makes a disclosure:

- never promise confidentiality.
- explain that you will have to share information with others who would be able to help and will only disclose to others who need to know
- tell them to whom you are going to inform of your concerns
- listen carefully and stay calm
- you need to listen without making assumptions or judgments
- do not interview the person; instead, ask questions normally and without pressure to ensure you understand what s/he is telling you.
- make sure that you do not use leading questions or suggest words
- reassure the person by telling them they have done the right thing
- make note of key information such as the date, time, place, and what the person said. Use the Safeguarding Report Form if practical to do so, see Annex C to access the safeguarding referral form
- ensure confidential records will be kept of the disclosure and will be stored electronically or in a locked cabinet in a confidential manner
- consider the student's or apprentice's wishes when determining what action to take
- do not investigate concerns or allegations yourself; contact the Safeguarding Team. In this instance, the Safeguarding Team member will consult the student or apprentice regarding the disclosure.

7.4 How to respond if a student or apprentice is at risk of significant harm:

7.4.1 Where a student or apprentice is suffering from or is likely to suffer from significant harm, it is crucial to refer to social care (and, if appropriate, the police) immediately. Anyone can make a referral.

7.4.2 The Safeguarding Team should be informed if a referral has been made as soon as possible.

7.4.3 There should be no delay in seeking immediate guidance about referring a student or apprentice at immediate risk of harm. See Annex A for explanations of useful terms and information on potential risk.

7.5 If this is related to a student aged between 14-16 years old:

7.5.1 Where applicable, the College Head responsible for any 14-16 provision will work collaboratively with the appropriate local authority/school to share information about the attendance and/or absences of a student as the Local Authority deems necessary.

7.5.2 The curriculum manager responsible will inform the relevant Local Authority immediately if a student is removed from college so that the Local Authority can identify children of compulsory school age who are missing education as part of their duty.

7.5.3 Where an allegation, suspicion, or incident is reported, the Curriculum Manager will notify the Headteacher of the school the student is from or any other Senior Manager with safeguarding responsibility of the relevant Local Authority or school as soon as possible. A curriculum Manager or Designated Safeguarding Lead can also carry out this action.

7.5.4 In all other respects, such allegations, suspicions, or incidents will be managed following the College's Safeguarding Policy and Procedures.

7.5.5 The Curriculum Manager responsible for any 14-16 provisions will ensure all participating schools and the Local Authority have signed up to a partnership agreement, which includes safeguarding practice, notification of vulnerability, travel arrangements, attendance monitoring/reporting and out-of-class supervision.

7.5.6 All students on school links programmes who make a safeguarding disclosure must be referred to the Designated Safeguarding Lead at the relevant school to be actioned under their safeguarding procedures. The Curriculum Manager responsible for any 14-16 provision or the College's Designated Safeguarding Lead will complete this.

7.6 Referring students on SWAP, Gateway, Bootcamp or other Employability-type-type programmes if a student or an apprentice tells you about possible abuse:

7.6.1 The Employability Team and the Safeguarding Team initially handle all prospective student referrals; see Annex F for a procedure flowchart.

8. Prevent Duty Procedures

8.1 Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people from becoming terrorists or supporting terrorism.

8.2 The Prevent Strategy:

8.2.1 Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.

8.2.2 Provides practical help to prevent people from being drawn into terrorism and ensures they are given appropriate advice and support Responds.

8.2.3 Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

8.2.4 It covers all forms of terrorism, including Islamist extremism, far-right extremism and some aspects of non-violent extremism.

8.3 The strategy covers all forms of terrorism, including far-right extremism and some aspects of non-violent extremism.

8.4 The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Office uses a range of measures to challenge extremism in the UK, including:

- 8.4.1 Where necessary, preventing apologists for terrorism and extremism from travelling to this country,
- 8.4.2 Giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- 8.4.3 Funding a specialist police unit which works to remove online content that breaches terrorist legislation
- 8.4.4 Supporting community-based campaigns and activities that can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context, they work with a range of civil society organisations.
- 8.4.5 Supporting people who are at risk of being drawn into terrorist activity through the Channel process for those who are susceptible to radicalisation/extremism and at risk, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

8.5 City of Wolverhampton College is subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of its functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

8.6 The College is committed to supporting vulnerable students through its safeguarding policies and procedures and recognises that this can support the College's contribution to the Prevent duty. The College also has a Prevent Action Plan that is reviewed regularly to ensure that the College remains compliant.

8.7 By way of preventative measures, learners are educated about hate crimes, including INCELS, radicalisation from far-right groups as well as Islamic extremism (plus their signs and symbols). Knowledge of all this is consolidated and tested throughout the academic year. This is complemented by the Student Code of Conduct and British Values policy.

8.8 Training is available to all staff as part of their induction, is revisited during the academic year and complemented by online training every three years. We actively promote awareness amongst the students through tutorials and key themed cross-college events throughout the year.

8.9 Referrals for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral. The Safeguarding Team will assess the referral information, and if it warrants a Prevent referral, it will be made.

9. Supporting Employers engaged in Work Experience and Apprenticeships

- 9.1 Employers offering training opportunities to students or apprentices will receive a copy of the Safeguarding Policy and Procedures and information on their safeguarding responsibilities.
- 9.2 Assessors, trainers or placement officers will conduct risk assessments and include safeguarding and Prevent elements in workplace reviews with students and apprentices.
- 9.3 Staff must report when they become aware of any allegations, suspicions or incidents involving students or apprentices on the employer's premises.
- 9.4 All students and apprentices will receive information about safe workplace practices and the Safeguarding Team's contact details.

10. Confidentiality

- 10.1 The welfare of the student/apprentice is paramount in any safeguarding matter. Only a restricted number of people within the College will have access to information about such incidents. Information will be shared on a 'need to know' basis; see Annex D.
- 10.2 The Data Protection Act 2018 and GDPR do not prevent the sharing of information to keep children safe. Fears about sharing information must not stand in the way of safeguarding and promoting the welfare and safety of children.

11. Position of Trust

- 11.1 All adults working with students and apprentices are in a position of trust concerning these students and apprentices.
- 11.2 A relationship between staff, volunteer or contractor and a student or an apprentice cannot be a relationship between equals. There is potential for exploitation and harm to the student or apprentice, and all staff are responsible for ensuring that an unequal balance of power is not used for personal advantage.
- 11.3 Under the Sexual Offences Act (2003), it is an offence for a person over 18 (e.g., teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education, and the person works in the same establishment as the child, even if s/he does not teach the child.
- 11.4 Staff should avoid behaviours that might be misinterpreted by others and adhere to the staff code of conduct (see Annex E).

12. Allegations of abuse made against staff

12.1 These procedures apply to all staff, partners and agency staff as well as to volunteers and should be followed in respect of all cases in which it is alleged that a member of staff would pose a risk of harm to children when they have:

- 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.

12.2 City of Wolverhampton College recognises that it has a duty of care to all its employees as an employer. Any allegation of abuse made against staff will be dealt with very quickly, fairly and consistently, providing effective protection for the child and, at the same time, supporting the person who is the subject of the allegation.

12.3 All allegations will be investigated as a priority in accordance with the College Disciplinary and Capability Policy and the Safeguarding Policy and Procedures to avoid any delay. The time taken to investigate and resolve individual cases depends on various factors, including the nature, seriousness and complexity of the allegation.

12.4 When an allegation is made, the College will try to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

12.5 The Designated Safeguarding Lead is responsible for dealing with allegations and liaising with third parties and will be supported by the Head of Human Resources. In some cases, this may also include the Principal. Where the College is not the direct employer, it will ensure allegations are dealt with appropriately and that they liaise with relevant parties.

12.6 Where the Principal is the subject of an allegation, the Chair of Governors will discuss the allegation immediately with the Designated Safeguarding Lead. The Designated Governor Lead may also be consulted. The Head of Human Resources may also be consulted and agree on a course of action.

12.7 The allegation may require immediate intervention by Wolverhampton Social Care Services and/or the Police. The Local Authority Designated Officer (LADO) will be informed of all allegations and will consult with the Police and Social Care Services as appropriate.

12.8 In this instance, the Designated Safeguarding Lead will take advice from the LADO, Police and Social Care Services to agree on the following:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what information can be reasonably given to the wider community to reduce speculation, and how can press interest be managed when it arises

12.9 There may be situations when the Designated Safeguarding Lead wants to involve the Police immediately if the member of staff concerned is deemed to be an immediate risk to students or apprentices or there is evidence of a possible criminal offence.

12.10 The staff member will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action unless there is an objection by the Social Care Services or Police. The individual will be advised to contact their Trade Union representative if they have one, or a colleague for support. They will also be given access to welfare support via the College.

12.11 Parents or carers of the student or apprentice involved will be told about the allegation as soon as possible. However, where a strategy discussion is required, or Police or Social Care Services need to be involved, the Designated Safeguarding Lead or the Head of Human Resources will not do so until those Agencies have been consulted and have agreed on what information can be disclosed to the parents or carers.

13. Suspension

13.1 The College will carefully consider whether the circumstances of the incident will warrant the member of staff being suspended from contact with students/apprentices or whether alternative arrangements can be put in place until the allegation or concern is resolved. The following alternatives could be considered before suspending a member of staff:

- Redeploying the member of staff to a different campus
- Redeploying the member of staff to another role
- Redeployment within the College so that the member of staff does not have direct contact with students or apprentices.
- Provision of supervision when a member of staff has contact with students or apprentices.
- Adapting the student or apprentice learning to avoid contact.

13.2 The Designated Safeguarding Lead will also consider the potential professional reputational damage to the staff member.

13.3 The Designated Safeguarding Lead will also consider the potential reputational damage to the College.

- 13.4 If there are concerns about the welfare of other children in the community or the member of staff's family, these concerns will be reported to the LADO or the Police by the Designated Safeguarding Lead(s), who will advise on whether a suspension should be considered.
- 13.5 An Executive Management Team (EMT) member with delegated powers from the Principal and Chief Executive will carry out the suspension based on the informed decision of the Designated Safeguarding Lead.
- 13.6 When it has been deemed appropriate to precautionarily suspend the member of staff, written confirmation outlining the reasons for suspension will be provided within one working day without unreasonable delay.
- 13.7 The Head of Human Resources will appoint a named HR member to be the point of contact for the staff member who is the subject of the allegation and will be responsible for keeping the staff member informed of the progress of the case and will provide further consideration of other support. Access to all College IT systems will be suspended during this time. The staff member will only be permitted to contact their HR point of contact and their Union Representative once precautionarily suspended.

14. Dealings with allegations

- 14.1 All dealings will be applied with common sense and judgment. This may form a series of meetings to discuss.
- 14.2 The initial sharing of information between the Designated Safeguarding Lead and LADO may lead to a decision that no further action is to be taken with regards to the staff member facing the allegation or concern, in which case this decision and justification for it will be recorded by the Designated Safeguarding Lead.
- 14.3 Parents or carers will also be kept informed about the progress of the case but will be made aware of the requirement to maintain confidentiality about any allegations made against staff whilst investigations are ongoing, as set out in section 141F of the Education Act 2002 (see paragraphs 233-234). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

15. Dealings with outcomes

- 15.1 Every effort will be made to conclude all allegations bearing on the safety or welfare of students or apprentices, including any in which the person concerned refuses to cooperate with the process.
- 15.2 The accused member of staff will be given a full opportunity to answer the allegation and make representations about it. However, the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated based on all the information available will continue even if that cannot be done or the accused member of staff does not co-operate.

15.3 It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a staff member's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

15.4 Once an outcome is reached, the following definitions will be used when determining the outcome of the allegation:

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation, and there has been a deliberate act to deceive
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- Unfounded: to reflect cases without evidence or proper basis to support the allegation.

15.5 If the allegation is substantiated and the member of staff is dismissed or the College ceases to use the member of staff or otherwise ceases to provide his or her services, the Designated Safeguarding Lead will seek advice from LADO regarding making a referral to DBS.

15.6 The College, as an employer, is legally required to make a referral to the DBS if it thinks that an individual has engaged in conduct that harmed (or is likely to harm) a child or if a person otherwise poses a risk of harm to a child.

15.7 Following a criminal investigation or prosecution, if the Police have decided to close the investigation without charge or not to continue to prosecute the case after the person has been charged, the Designated Safeguarding Lead will seek advice from LADO on whether any further action, including disciplinary action, is appropriate.

15.8 If an allegation is shown to be deliberately invented or malicious, the Designated Safeguarding Lead will consider whether any disciplinary action is appropriate against the student/apprentice who made the malicious allegation or whether the Police should be contacted to consider if action might be appropriate against the person responsible, even if he or she was not a student/apprentice.

15.9 Where it is decided that a member of staff who has been suspended can return to work, the Designated Safeguarding Lead and Head of Human Resources will consider how best to facilitate that. Depending on the individual's circumstances, a phased return with support in the short term may be appropriate. The Designated Safeguarding Lead will consider how the person's contact with students/apprentices can be best managed.

15.10 If the accused staff member or volunteer ceases to provide services, this will not prevent an allegation from being followed up in accordance with this Policy and Procedures. The College will not reach a settlement or compromise agreement.

15.11 Parents or carers will be contacted to confirm that an appropriate sanction has been awarded, but no sanction details will be shared. They may also be informed if the case was dismissed if there was no case to answer. The deliberations of a disciplinary hearing and the information considered in reaching a decision will not be disclosed.

15.12 For all allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, any action taken, and decisions reached be kept in a confidential personal file of the member of staff. Copies would be provided to staff members.

15.13 The outcomes of allegations may be shared as part of references provided by the College. Allegations against staff or volunteers that were proven false, unsubstantiated, or malicious should not be included in any references provided by the College.

Annex A - Indicators of abuse, neglect and exploitation

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

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

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put students and apprentices at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that young people are at risk.

Specific safeguarding issues all staff should be aware of include:

Contextual safeguarding: Safeguarding incidents and/or behaviours can be associated with factors outside of the College environment and/or can occur between young people outside of the College. This is known as contextual safeguarding. It is key that all College staff understand the definition of contextual safeguarding and consider whether young people are at risk of abuse or exploitation in situations outside their families. Through training we will ensure that staff and volunteers are aware that extra-familial harms take a variety of different forms and young people can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible so the Safeguarding Team can make a referral with a holistic view of the young person. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Young people with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration;
- young people with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

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

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse that occur 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, in 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 can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and 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 from harm from others. 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), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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 criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE): CSE is a form of child sexual abuse. Sexual abuse 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 in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the County lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into County lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as County lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the County lines network.

One of the ways of identifying potential involvement in County lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 103 should be considered. If a child is suspected to be at risk of or involved in County lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of County lines exploitation.

Further information on the signs of a child's involvement in County lines is available in guidance published by the [Home Office](#).

Domestic abuse: The cross-Government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Female Genital Mutilation (FGM): Whilst all staff should speak to the designated Safeguarding Lead (or Deputy) about any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police.

Mental Health: 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 or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Child-on-Child abuse (peer-on-peer): All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of College and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their College, it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse they should speak to their designated Safeguarding Lead (or Deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually 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.

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 peers;
- 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);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
 - 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; and
 - 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).

Serious violence: All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, 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 and may be at risk of criminal exploitation.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature.

Safeguarding responses to children who go missing: All staff should be aware of the safeguarding responsibilities for young people who are missing education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

The following procedures and processes will be adhered to ensure there is an appropriate safeguarding response to young people who go missing from College:

- The College make every effort to contact parents and carers and follow up with the emergency contacts held
- Staff will alert the Safeguarding Team to any concerns raised regarding young people who are absent from College

So-called 'honour-based' abuse: (including Female Genital Mutilation and Forced Marriage) (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all Agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or Deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for Multi-Agency liaison with Police and Children's Social Care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

Domestic Abuse: Staff are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. We understand that young people can be victims of domestic abuse, and this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

Young people who are lesbian, gay, bi or trans (LGBT): The fact that a young person may be LGBT is not in itself an inherent risk factor for harm. However, in line with 'Keeping Children Safe in Education', we recognise that young people who are LGBT or those perceived by other young people to be LGBT could potentially be more vulnerable. Therefore, we work to reduce any additional barriers faced. We provide a safe space for these young people to speak out or share their concerns with members of staff.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and Colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 35-36 of which focus on the role of Schools and Colleges. College staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk

Preventing radicalisation: Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of the College's safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Terrorism is 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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or Deputy) making a Prevent referral.

The School's or College's Designated Safeguarding Lead (and any Deputies) should be aware of local procedures for making a Prevent Referral.

The Prevent Duty: All Schools and Colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty.

The Prevent Duty should be seen as part of College's wider safeguarding obligations. Designated Safeguarding Leads and other senior leaders should familiarise themselves with the revised Prevent Duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

There is additional guidance: Prevent Duty guidance: for Further Education Institutions in England and Wales that applies to Colleges.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a Multi-Agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the School or College may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Sexual violence: It is important that College staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

For further advice, the links below will provide information from Government website:

[Child sexual exploitation \(CSE\)](#)

[Bullying including cyberbullying](#)

[Domestic-violence-and-abuse](#)

[Drugs](#)

[Fabricated-or-induced illness](#)

[Faith-or-belief](#)

[Female-Genital-Mutilation \(FGM\)](#)

[Forced marriage](#)

[Youth violence and gang involvement](#)

[Violence-against-women-and-girls](#)

[Mental health](#)

[Private fostering](#)

[Preventing radicalisation](#)

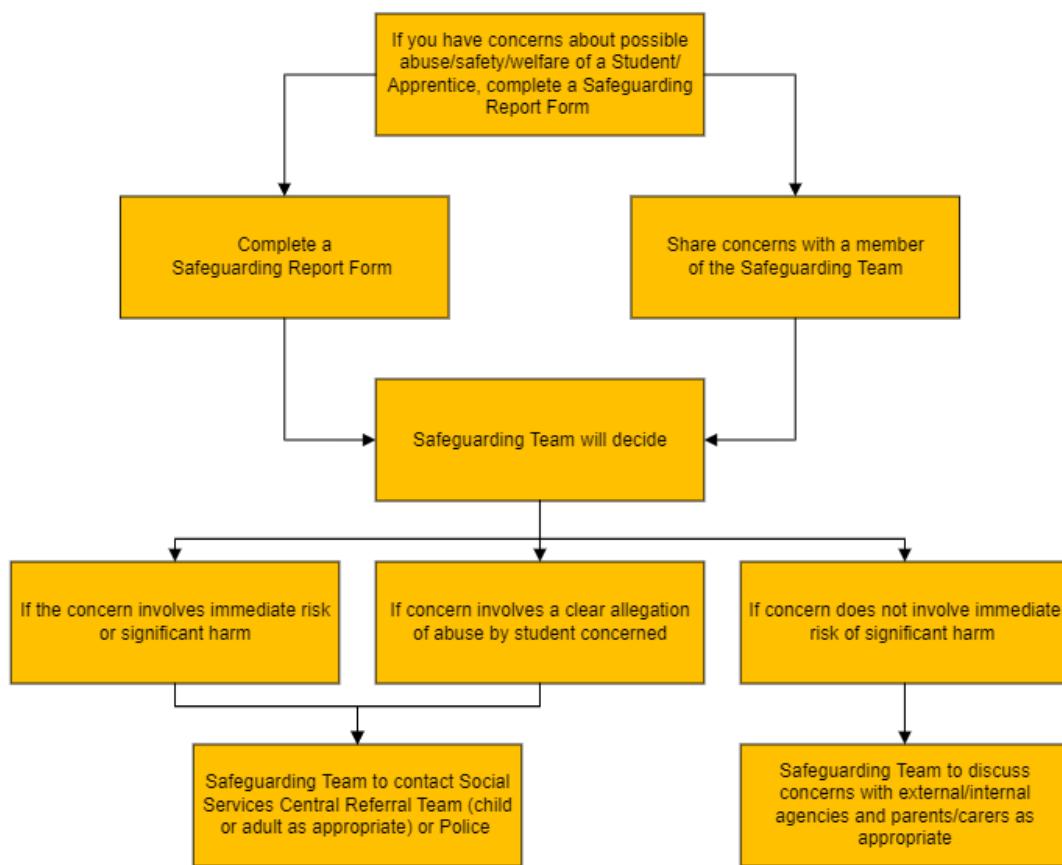
[Teenage relationship abuse](#)

[Trafficking](#)

Annex B - City of Wolverhampton College Safeguarding Procedure

In line with Keeping Children Safe in Education 2025, the Safeguarding Policy and Procedure makes clear that any member of staff can make a direct referral to Children's Social Care or the Police if they believe a student is at immediate risk of harm, or if they feel the College has not appropriately addressed their concerns. This ensures that no staff member feels prevented from taking action to safeguard a student.

However, under normal circumstances, safeguarding concerns should follow the College's internal safeguarding procedures, as outlined in the process diagram. The Safeguarding Team will review all referrals and, where appropriate, escalate the matter to external agencies. This approach ensures both compliance with statutory guidance and consistency in the management of safeguarding concerns.



Safeguarding Team contact details:

Peter Merry ☎ 07733 625477

Anil Sharma ☎ 07534 558517

Jas Bhangi ☎ 07534 558510

Colin Perrin ☎ 07534 558514

Dandol Juman ☎ 07534 558752

✉ safeguarding@wolvcoll.ac.uk

Annex C - Safeguarding Referral/Report Form

The following link can be used to make a safeguarding referral [Safeguarding Referral Form](#)

Annex D - The Seven Golden Rules for Sharing Information (including personal information)

The following information sharing advice is from the Department for Education.:

- 1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy or the privacy rights of the person(s) failing to protect them.**

The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

- 2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.**

You are not required to inform them if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

- 3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.**

You need a lawful basis to share information under data protection law, but when you intend to share information as part of an action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

- 4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.**

Do not leave a child at risk of harm because you have concerns that you might be criticised for sharing information. Instead, seek advice about what information to share and with whom. This may be the safeguarding team, the Data Protection Officer or your line manager.

- 5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**

6. **Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support and only share the information they need to support the provision of their services.**

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

7. **Record the reasons for your information-sharing decision, irrespective of whether or not you decide to share information.**

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

Annex E Code of Conduct for Staff concerning Safeguarding

The Code of Conduct applies to all staff, including those in teaching, administrative, management, support, and volunteer roles, as well as temporary and permanent staff. The word “staff” is used for ease of description.

This Code of Conduct aims to provide all college staff with guidance and minimise the risk of staff being accused of improper conduct, particularly towards students or apprentices with whom they come into contact during work.

The Code of Conduct should be considered in line with the College's British Values and other association policies and procedures.

You should always:

- wear a staff identification badge, which must always be visible whilst on college premises.
- ensure that visitors/contractors are signed in and made aware of safeguarding procedures.
- avoid any conduct which could lead any reasonable person to question your motivation and intentions.
- take seriously any allegations, suspicions or concerns about abuse that a student or apprentice makes (including those made against staff) and report them, following procedures outlined in the Safeguarding Policy and Procedures.
- provide an opportunity and a safe environment for students and apprentices to be able to discuss or raise concerns they may have.
- risk assess all situations, activities, buildings and trips to ensure all potential dangers have been identified and the risk minimised.
- create an environment that encourages students and apprentices to feel comfortable and confident in challenging bullying and any attitudes or behaviours that may be discriminatory in any way.
- seek advice from your Line Manager if in any doubt about sharing student information or receiving a request for students' or apprentices' information from an external caller, either via telephone, email or face-to-face.
- avoid meetings with students or apprentices in remote or secluded areas.
- show understanding and sensitivity when dealing with emotional issues.

You should never:

- allow or accept abusive and discriminatory behaviour.
- make inappropriate personal remarks to a student or apprentice, including through email, text messages, phone or letter.
- share personal contact details with students or apprentices, this includes personal mobile phone numbers, social networking contacts or personal e-mail addresses.
- discuss your own sexual relationships with, or in the presence of, students or apprentices.
- set up a social networking site that allows anyone to access without an invitation or invite students or apprentices to join a personal social networking page or group that is not college approved.
- engage in a sexual relationship with students or make sexually suggestive comments.

- give personal money to students or apprentices or accept money or gifts from a student or apprentice.
- show favouritism.
- promote your religious or political ideas or beliefs.
- provide lifts in your car to students or apprentices without prior written agreement from your Line Manager. If you are providing a lift to students or apprentices, ensure that two members of staff are present in the car and that business insurance is in place.
- promise to keep any information a student or apprentice discloses confidential.
- use your position to gain access to information for your own advantage and/or at a student's, apprentice's, or their family's detriment.
- never indulge in horseplay, tickling or fun fights

It is not possible to provide a complete checklist of what is or is not appropriate behaviour in all circumstances.

There may be occasions and circumstances in which you may have to decide on the best interest and welfare of students or apprentices, which could breach this code. In such instances, you must ensure that a member of the Executive Management Team (EMT) is made aware of the action taken as soon as possible and that a record is kept, so that you are seen to be acting appropriately.

If you require clarification or further information, please discuss with your Line Manager, a member of the Human Resources Team or the Head of Safeguarding and EDI.

Annex F - Safeguarding Referral Process for SWAP, Gateway, Bootcamp and any other Employability Programmes

