CITY OF WOLVERHAMPTON COLLEGE

Safeguarding

Policy and Procedures - Incorporating Child Protection 2026-2027

Head of Safeguarding and EDI

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1.0 Introduction

1.1 City of Wolverhampton College is committed to safeguarding and promoting the welfare of its learners and to providing a safe environment in which they can learn, train and work.

1.2 The College recognises its:

- statutory safeguarding responsibilities towards children;
- responsibilities towards adults who may be at risk of abuse or neglect;
- prevent duty towards children and adults; and
- duty of care towards staff.

1.3 The College will maintain effective safeguarding policies, procedures and practices that reflect:

- relevant legislation;
- Keeping Children Safe in Education (KCSIE) 2026;
- Working Together to Safeguard Children 2026;
- statutory Prevent duty guidance;
- the Care Act 2014 and applicable adult-safeguarding arrangements; and
- locally agreed multi-agency safeguarding arrangements established through Wolverhampton Safeguarding Together.

1.4 KCSIE 2026 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 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 the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

1.5 Safeguarding and promoting the welfare of children is everyone's responsibility. The College will maintain a child-centred and coordinated approach, always considering what is in their best interests.

1.6 No single practitioner will necessarily have a complete picture of a child's needs and circumstances. Everyone who encounters learners has a role in identifying concerns, sharing relevant information and taking prompt action.

1.7 Consistent with Working Together to Safeguard Children 2026, the College recognises the importance of:

- helping children and families as soon as needs or problems emerge;
- working collaboratively with children, parents, carers, family networks and relevant agencies;
- supporting children to remain safely with their birth parents or wider family network wherever possible and consistent with their best interests;

- recognising and supporting appropriate kinship-care arrangements;
- protecting children from harm inside and outside their homes, including online; and
- promoting stable, safe and loving relationships and positive educational and welfare outcomes.

1.8 Where relevant to its education and safeguarding role, the College will contribute to the outcomes in the Children's Social Care National Framework:

- children, young people and families stay together and get the help they need;
- children and young people are supported by their family network;
- children and young people are safe in and outside their homes; and
- children in care and care leavers have stable, loving homes.

1.9 These principles inform the College's approach but do not replace the KCSIE definition in section 1.3 or alter the statutory responsibilities of children's social care.

1.10 Child protection forms part of safeguarding and promoting the welfare of children. It means activity undertaken to protect a specific child who is suspected of suffering or likely to suffer significant harm. Harm may occur:

- inside or outside the home;
- within the family or wider family network;
- within the College or another education setting;
- in foster care, residential care or other accommodation;
- within peer or intimate relationships;
- in the community;
- in employment, work experience or training;
- through exploitation or other extra-familial harm; and
- online or through technology.

1.11 For the purposes of KCSIE and this policy, a child is anyone under the age of 18.

1.12 The term learner, as used in this policy, refers to a student or an apprentice.

1.13 A learner's eighteenth birthday does not end the College's general safeguarding and welfare responsibilities. Concerns about a learner aged 18 or over will be considered under:

- the Care Act 2014 and local adult-safeguarding procedures where the statutory criteria apply;
- the College's Prevent duty;
- applicable criminal, equality, health and safety and employment legislation; and
- the College's safeguarding, welfare, disciplinary and support procedures.

1.14 A learner may have an Education, Health and Care Plan which may continue until age 25, but this does not extend the statutory definition of a child to age 25.

1.15 The response will take account of the person's circumstances, wishes, mental capacity and level of risk.

1.16 Staff must recognise that a learner's experiences, exposure to harm, access to support and ability to report concerns may be affected by factors including:

- age and developmental stage;
- disability, SEND or health needs;
- communication needs or language;
- sex and sexual orientation;
- race, ethnicity, culture or faith;
- economic and social circumstances;
- care experience and family arrangements;
- immigration status;
- pregnancy or parenthood; and
- experiences of discrimination, prejudice, harassment or unequal power.

1.17 Staff must exercise professional curiosity and must not allow stereotypes or assumptions to prevent concerns from being recognised, reported and addressed.

1.18 The College's safeguarding practice will be inclusive, equitable, anti-discriminatory and anti-racist.

2.0 Purpose

2.1 The purposes of this Safeguarding Policy and Procedures are to:

- protect learners from abuse, neglect, exploitation and other harm;
- provide a safe environment for education, training and work-based learning;
- establish clear responsibilities and reporting procedures;
- support timely identification, referral and intervention;
- promote a whole-College approach to safeguarding;
- provide staff, Governors, volunteers, employers, contractors, learners and families with the principles guiding the College's safeguarding arrangements; and
- explain how the College works with safeguarding partners and other agencies.

2.2 The College will place the safety, welfare and best interests of learners at the centre of safeguarding decisions.

2.3 In relation to adult learners, the College will apply relevant adult-safeguarding principles, including appropriate regard for the person's wishes, rights and mental capacity.

2.4 The College aims to ensure that every learner has a positive experience within a safe, respectful and welcoming environment, irrespective of age, disability, sex, race, religion or belief, sexual orientation, gender reassignment, pregnancy or maternity, socioeconomic background or other status.

2.5 The welfare of staff is important, but allegations or concerns involving staff must be managed in a way that maintains the welfare of the learner as the paramount consideration.

2.6 The College recognises that any learner may experience abuse or harm. Some learners may face additional safeguarding barriers or vulnerabilities, including those who:

- have SEND, disabilities or health conditions;
- have communication needs;
- are looked after, previously looked after, care-experienced or living in kinship care;
- are young carers;
- are experiencing poverty, homelessness or insecure accommodation;
- are from minority ethnic or faith communities and experience racism or discrimination;
- are lesbian, gay or bisexual, or are perceived to be;
- are questioning their gender;
- are pregnant or are parents;
- have experienced exclusion, disrupted education or Alternative Provision;
- are refugees, asylum seekers or migrants;
- have a parent or carer in custody or are affected by parental offending; or
- experience bullying, prejudice, discrimination or social isolation.

2.7 A protected characteristic or personal identity is not, by itself, evidence of a safeguarding risk. The College will consider each learner's individual circumstances and take reasonable and proportionate steps to remove barriers, prevent discrimination and provide appropriate support.

2.8 Through induction, training and regular updates, staff will know how to:

- recognise indicators of abuse, neglect, exploitation and other safeguarding concerns;
- respond appropriately to a disclosure;
- reassure the learner that they are being taken seriously and will be supported;
- maintain appropriate confidentiality without promising secrecy;
- make an accurate and timely record;
- report concerns through the College's safeguarding system; and
- take immediate action where a child or another person is in danger.

2.9 Staff must recognise that a learner may not feel ready or know how to disclose abuse, exploitation or neglect and may not recognise their experience as harmful. This must not prevent staff from exercising professional curiosity and reporting a concern.

2.10 Staff must **never** promise that safeguarding information will be kept secret. They should explain that information will be shared only with people who need it to help keep the learner or others safe.

3.0 Scope

3.1 This policy is mandatory for everyone working for or on behalf of City of Wolverhampton College and for learners where the policy places responsibilities upon them.

3.2 An alleged failure to comply will be considered promptly and fairly under the applicable:

- staff disciplinary procedure;
- learner behaviour or disciplinary procedure;
- volunteer arrangement;
- contract or service agreement;
- partnership or subcontracting agreement; or
- governance procedure.

3.3 A breach may result in disciplinary, contractual, regulatory or safeguarding action, up to and including dismissal, exclusion or termination of an arrangement where justified. It may also result in referral to the LADO, Disclosure and Barring Service, police, professional regulator or another relevant authority.

3.4 This policy applies to:

- governors and senior leaders;
- permanent, temporary and casual staff;
- agency and supply staff;
- trainee teachers;
- College-employed apprentices;
- volunteers;
- contractors, consultants and visitors;
- subcontractors and partner organisations;
- employers and work-placement providers; and
- anyone delivering education, training, support or services for or on behalf of the College.

3.5 It applies across:

- all College campuses and premises;
- work experience, industry placements and apprenticeships;
- educational visits and off-site activities;
- subcontracted and partner provision;
- remote, hybrid and online learning;
- College transport and authorised travel arrangements; and
- events or activities provided under the College's supervision or management.

3.6 Safeguarding concerns arising outside these settings must also be reported where they may affect the safety or welfare of a learner or another person.

3.7 Safeguarding and promoting the welfare of learners is everyone's responsibility. Everyone who encounters learners and their families has a role in identifying concerns, sharing relevant information and taking appropriate action.

3.8 Staff must adopt a child-centred approach for learners under 18 and consider what is in the child's best interests.

3.9 For adult learners, staff must adopt a person-centred approach consistent with relevant adult-safeguarding principles and the need to protect other people from harm.

3.10 All staff have safeguarding responsibilities, whether or not their role constitutes regulated activity.

4.0 Which procedure should be followed?

4.1 Before reporting a concern, staff should identify whether it concerns a learner's welfare, the conduct of an adult working for or on behalf of the College, or an employment matter. If there is any uncertainty, discuss the matter with the Designated Safeguarding Lead or with the safeguarding team. Uncertainty must not delay action required to protect a learner.

4.2 Pathway 1: A safeguarding concern about a learner

4.2.1 Use this pathway when: There is information or a concern that a learner may be experiencing, or may be at risk of, abuse, neglect, exploitation or other harm.

4.2.2 Report to: The Designated Safeguarding Lead, or the Safeguarding Team, using the College's safeguarding reporting system.

4.2.3 Lead responsibility: The DSL or Deputy DSL leads the safeguarding response, including immediate protection, learner support and referrals to relevant external agencies.

4.2.4 Examples include:

- a learner discloses abuse or neglect;
- unexplained injuries or significant changes in behaviour;
- concerns about exploitation, radicalisation or online harm;
- domestic abuse affecting a learner;
- child-on-child abuse; or
- concerns about a learner's safety outside the College.

4.3 Pathway 2: A concern or allegation about a member of staff or another adult

4.3.1 Use this pathway when: A concern relates to the conduct of a member of staff, volunteer, Governor, contractor, agency worker or another adult working for or on behalf of the College.

4.3.2 Report to: The Principal and Head of Human Resources (Head of People and Organisational Development), in accordance with the College's allegations and low-level-concerns procedure. The DSL/Deputy must also be informed so the learner's safety and support needs can be addressed.

4.3.3 Report any concern about the Principal to the Chair of Governors. A concern about the Chair of Governors must be reported in accordance with the College's agreed procedure.

4.3.4 Lead responsibility: The Principal normally acts as case manager. Where the allegation concerns the Principal, the Chair of Governors acts as case manager.

4.3.5 Head of Human Resources advises and supports the case manager on employment matters, disciplinary procedures, staff welfare and communication with the person who is the subject of the concern.

4.3.6 The DSL/Deputy remains responsible for safeguarding and supporting the learner.

4.3.7 Examples include:

- an adult may have harmed or attempted to harm a learner;
- an adult may have committed an offence against or relating to a learner;
- an adult has behaved in a way indicating that they may pose a risk of harm;
- an adult has behaved in a way indicating that they may not be suitable to work with learners; or
- an adult's behaviour may be inconsistent with the Staff Code of Conduct, including a low-level concern.

4.3.8 Staff must not investigate the matter, confront the person concerned or discuss it with anyone who does not need to know.

4.4 Pathway 3: A staff employment matter with no identified safeguarding implications

4.4.1 Use this pathway when: The matter relates solely to a member of staff's employment or workplace experience, and there is no indication that a learner may be at risk.

4.4.2 Report through: Human Resources procedure.

4.4.3 Examples include:

- a grievance concerning working arrangements;
- a disagreement between colleagues;
- performance or capability concerns;
- attendance or conduct matters unrelated to learner safety; or
- a complaint of workplace bullying or harassment that does not involve a learner or indicate a wider safeguarding risk.

4.4.4 If information emerges suggesting that a learner may be at risk, refer the matter immediately through the appropriate safeguarding pathway.

5.0 Regulated Activity

5.1 Whether a role is classed as regulated activity affects:

- whether a person is barred from the relevant workforce to undertake a role;
- eligibility for an enhanced DBS check with barred list information;
- the College's duty to check barred-list status; and
- possible duties to refer information to the DBS.

5.2 Working within regulated-activity status does not replace safer recruitment, appropriate supervision, risk assessment, professional boundaries, safeguarding training or the duty to report concerns.

5.3 Regulated activity is work that a person barred from the relevant workforce must not undertake.

5.4 Regulated activity relating to children and regulated activity relating to adults are separate legal categories. They must be assessed independently according to the activities undertaken, the person receiving them, their frequency and, where relevant, the setting.

5.5 The term "adult at risk" should not be used as though it automatically determines regulated-activity status. For adults, regulated activity is based principally on the nature of the service provided, not simply the person's age, disability, diagnosis or perceived vulnerability.

5.6 A person may be engaging in regulated activity relating to children if they:

- work frequently in a specified establishment, including a qualifying school or college, in connection with its purposes and with an opportunity for contact with children;
- frequently teach, train, instruct, care for or supervise children;
- frequently provide advice or guidance wholly or mainly to children concerning their physical, emotional or educational wellbeing;
- frequently drive a vehicle used only to convey children and relevant carers or supervisors;
- provide relevant personal care to a child;
- provide healthcare to a child as a regulated healthcare professional or under the direction or supervision of one; or
- manage another person who is undertaking regulated activity.

5.7 Where a frequency condition applies, it generally means activity carried out frequently, on more than three days in any 30-day period or, for applicable activities, overnight between 2 am and 6 am with an opportunity for face-to-face contact.

5.8 Relevant personal care and healthcare are regulated activity even if carried out only once.

5.9 From 1 September 2026, the previous supervision exemption is removed. Qualifying paid or unpaid teaching, training, instruction, care or supervision of children may therefore be regulated activity even where the worker or volunteer is supervised.

5.10 A person is a child only until their eighteenth birthday. An Education, Health and Care Plan may continue until age 25, but this does not:

- extend the statutory definition of a child to age 25;
- make a college a specified establishment for children solely because it educates adults with EHCPs;
- make every person working with that learner engaged in regulated activity relating to adults; or
- automatically permit an enhanced DBS check or barred-list check.

5.11 Work with an adult learner who has an EHCP must be assessed under the separate legal definition of regulated activity relating to adults. Relevant factors include whether the role provides:

- healthcare;
- personal care;
- social work;
- assistance with the adult's cash, bills or shopping because of age, illness or disability;
- assistance in the conduct of the adult's own affairs; or
- qualifying transport to or from healthcare, personal care or social work.

5.12 Ordinary teaching, training or supervision of an adult learner is not, by itself, regulated activity relating to adults.

6.0 Barred persons and DBS checks

6.1 It is a criminal offence for a person who is barred from working with children or adults to engage, or seek to engage, in regulated activity from which they are barred.

6.2 It is also an offence for an organisation knowingly to permit a barred person to engage in that regulated activity.

6.3 Where a role constitutes regulated activity, the College will obtain the appropriate level of DBS check, including the relevant barred-list information, before the person undertakes the activity, subject only to any lawful and risk-assessed exception permitted by statutory guidance.

6.4 The College will:

- determine DBS eligibility according to the actual duties of the role;
- request children's or adults' barred-list information only where legally permitted;
- not assume that every role involving contact with learners is regulated activity;
- reassess eligibility when duties change; and
- comply with its legal duty to refer a person to the DBS where the statutory referral conditions are met.

6.5 An enhanced DBS check without barred-list information may be available for some roles that provide regular contact with children but do not constitute regulated activity. The appropriate check must be determined on a case-by-case basis.

7.0 The role of the Governing Body

7.1 The College's Governing Body will:

- hold strategic leadership responsibility for the College's safeguarding arrangements and ensure compliance with relevant legislation and statutory guidance, including KCSIE;
- receive appropriate safeguarding and child protection training, including online safety, at induction and that this training is updated regularly;
- appoint a Board-level safeguarding Lead to provide leadership, challenge and assurance concerning the College's safeguarding arrangements;
- ensure the Chair of Governors acts as case manager and liaises with the Local Authority Designated Officer (LADO), Human Resources and relevant partner agencies where an allegation is made against the Principal;
- ensure there is an appropriate senior member of the College leadership team assigned as the Designated Safeguarding Lead (DSL) ensuring that they have the status, authority, time, funding, training, resources and support required to discharge the role effectively;
- ensure Deputy DSLs are appropriately trained and robust cover arrangements are in place, recognising that the DSL retains ultimate lead responsibility for safeguarding and child protection;
- facilitate a whole-College approach in which safeguarding and the best interests of learners are embedded in relevant policies, procedures, curriculum planning and decision-making;
- ensure the College has effective, clear and accessible safeguarding and child protection policies and procedures that:
  - comply with statutory guidance and locally agreed multi-agency safeguarding arrangements;
  - include appropriate responses to child-on-child abuse;
  - provide accessible and well-publicised systems through which staff and learners can report abuse, neglect or other concerns;
  - ensure learner's wishes and feelings are considered when action and support are determined; and
  - are reviewed at least annually and updated whenever required;
- ensure the College has an effective Staff Code of Conduct covering professional boundaries
- ensure fair, effective and timely procedures are in place for managing:
  - allegations that may meet the harm threshold; and
  - concerns that do not meet the harm threshold, including the recording and review of low-level concerns;
- ensure safer recruitment policies and practices comply with Part Three of KCSIE, including appropriate selection, identity, employment-history, reference, qualification, prohibition, right-to-work, DBS and barred-list checks;

- ensure the statutory Single Central Record (SCR) is maintained accurately and subject to appropriate governance oversight;
- ensure ongoing vigilance and promotion of a culture that deters abuse and challenges inappropriate behaviour;
- ensure effective systems are in place to identify and respond promptly to learners who may need support, are suffering or likely to suffer harm, are at risk of exploitation, are at risk of radicalisation or are otherwise vulnerable;
- ensure all staff receive appropriate safeguarding and child protection training, including online safety and filtering and monitoring responsibilities; that training is regularly updated; and that safeguarding updates are provided as required and at least annually;
- ensure learners are taught how to keep themselves and others safe, including online, in an age-appropriate and inclusive manner which takes account of individual needs and vulnerabilities, including SEND learners;
- ensure appropriate filtering and monitoring systems are in place across all relevant College devices and locations
- ensure responsibility for filtering and monitoring is clearly assigned and that the effectiveness of the arrangements is reviewed, checked and recorded at least once every academic year;
- ensure online safety is treated as a running and interrelated theme throughout safeguarding policies, curriculum planning, staff training and the responsibilities of the DSL;
- ensure the College fulfils its responsibilities under the Prevent duty and maintains an appropriate Prevent risk assessment and action plan;
- ensure safeguarding concerns and referrals are recorded clearly, accurately, confidentially and securely and that child protection files are maintained and transferred in accordance with statutory guidance;
- ensure the College works effectively with Wolverhampton Safeguarding Together, local authority children's social care, police, health services and other safeguarding partners to safeguard and promote the welfare of children and learners;
- allow local authority Children's Social Care, whether from Wolverhampton or an appropriate placing authority, to access to a learner so that it can conduct or consider whether to conduct a section 17 or section 47 assessment under the Children Act 1989;
- ensure effective arrangements are in place with employers, subcontractors, partnerships, training organisations and work-placement providers to safeguard learners;
- where services or activities are provided separately by another organisation using College premises:
    - seek assurance that the provider has appropriate safeguarding and child protection policies and procedures;
    - inspect those arrangements where necessary;
    - establish clear arrangements for liaison and reporting concerns;
    - ensure safeguarding requirements are included in any relevant contract or agreement; and

  - follow the College's safeguarding procedures, including informing the LADO where appropriate, if an allegation arises concerning an incident connected with the use of the premises;
- receive appropriate safeguarding information and reports, including the DSL's annual safeguarding report, to enable the Governing Body to scrutinise practice, challenge leaders and assure itself that policies and procedures are effective; and
- require significant safeguarding weaknesses, policy deficiencies or failures identified by the DSL, Wolverhampton Safeguarding Together, auditors, inspectors or another relevant body to be reported promptly and remedied without unnecessary delay.

8.0 The role of the Designated Safeguarding Lead

8.1 The College's Designated Safeguarding Lead (DSL) is a senior member of the College leadership team and has ultimate lead responsibility for safeguarding and child protection. This includes online safety and an understanding of the filtering and monitoring systems and processes in place. The DSL's ultimate lead responsibility must not be delegated.

8.2 The DSL is responsible for:

- providing leadership, advice and expertise on safeguarding, child protection and learner welfare;
- ensuring that safeguarding arrangements are effective, child-centred and understood throughout the College;
- meeting regularly with the Head of Safeguarding and EDI to review safeguarding activity, referrals, serious or complex cases, patterns and trends, emerging risks and relevant sector developments;
- ensuring that safeguarding team members are appropriately trained and suitable cover arrangements are in place, while retaining ultimate accountability for safeguarding and child protection;
- ensuring learners know how to report concerns or seek help and that reporting routes are accessible, age-appropriate and widely communicated;
- referring cases of suspected abuse or neglect to local authority children's social care, including the Multi-Agency Safeguarding Hub (MASH), as required, and supporting staff who make referrals;
- making or supporting referrals to the Channel programme where there is a concern about radicalisation, as required;
- ensuring referrals are made to the Disclosure and Barring Service (DBS) where a person is dismissed or removed from regulated activity, or would have been removed had they not left, because the relevant referral conditions are met;
- referring matters to the Police where a crime may have been committed or where immediate police assistance is required;
- liaising with the College Principal regarding safeguarding issues, particularly ongoing enquiries under section 47 of the Children Act 1989 and Police investigations, including awareness of the requirement for a child to have an Appropriate Adult where applicable;
- Liaising with the Principal, Head of Human Resources, and the Local Authority Designated Officer (LADO) where an allegation or safeguarding concern relates to

a member of staff, volunteer, contractor, or other adult working for or on behalf of the College.

- acting as the point of contact with safeguarding partners, including Wolverhampton Safeguarding Together (WST), local authority Children's Social Care, the Police and other relevant agencies;
- working with curriculum, pastoral, attendance, SEND, mental health, IT and other appropriate staff so that safeguarding and welfare needs, including online safety, are considered holistically;
- promoting supportive engagement with parents and carers unless doing so may place a learner at additional risk or compromise a safeguarding or criminal investigation;
- understanding how safeguarding and welfare matters may affect attendance, engagement, achievement and educational outcomes and helping relevant staff provide appropriate support and reasonable adjustments;
- attending and contributing to strategy discussions, inter-agency meetings and assessments, or supporting another appropriately informed member of staff to do so;
- maintaining clear, accurate, factual, up-to-date, confidential and securely stored safeguarding records;
- ensuring records distinguish between observed facts, professional opinion and historical information and document actions, decisions, rationale and outcomes;
- monitoring safeguarding information for recurring concerns, patterns and trends and ensuring appropriate action is taken;
- ensuring safeguarding information is shared lawfully, securely and on a need-to-know basis;
- ensuring appropriate safeguarding arrangements are made at all transition points;
- ensuring child protection files are transferred separately and securely to a learner's new education setting as soon as possible and within five days for an in-year transfer or within the first five days of a new term, with confirmation of receipt obtained;
- ensuring transferred files include a clear, structured summary of current concerns, relevant context and ongoing support needs;
- liaising with schools and academies so that safeguarding information is received, reviewed and acted on when learners transfer to the College;
- working with employers, training organisations and placement providers to ensure appropriate safeguarding arrangements are established, recorded and monitored for learners undertaking work experience or placements;
- ensuring staff have access to and understand the College's Safeguarding Policy and Procedures;
- ensuring the Safeguarding Policy and Procedures are reviewed at least annually, updated when required, approved through the College's governance arrangements and made publicly available;
- linking with WST and other safeguarding partners so that staff are aware of current local procedures, priorities and training opportunities;
- completing DSL training at least every two years, Prevent awareness training and relevant professional development, with knowledge and skills refreshed regularly and at least annually; and

- providing Governors with an annual report explaining how the College has discharged its safeguarding duties and reporting any significant deficiency in safeguarding practice, procedure or policy at the earliest opportunity.

9.0 The role of the Deputy DSL and College Safeguarding Team

9.1 The Deputy DSL must be trained to the same standard as the DSL. They and other appropriately trained members of the College Safeguarding Team may undertake safeguarding activities delegated by the DSL, but the DSL retains ultimate lead responsibility.

9.2 The Deputy DSL and the College Safeguarding Team are responsible for:

- receiving, reviewing, recording and progressing safeguarding concerns and disclosures;
- acting immediately where a learner is suffering or likely to suffer harm and progressing all other concerns without unnecessary delay;
- ensuring no safeguarding matter is left unallocated or without appropriate follow-up;
- providing immediate safeguarding and welfare support, including appropriate safety planning and internal or external support;
- making or supporting appropriate referrals to children's social care/MASH, the police, Channel and other relevant services;
- supporting staff throughout the referral process;
- attending and contributing to case conferences, core groups, review conferences, strategy discussions and other inter-agency meetings, as appropriate;
- liaising with relevant staff and external professionals so that learners' needs are considered holistically;
- maintaining accurate and timely records of concerns, actions, decisions, rationale and outcomes;
- actively listening to learners and helping them communicate their wishes, feelings and concerns without leading or investigating them;
- ensuring that, during term time and College operating hours, the DSL or a deputy is available for staff to discuss safeguarding concerns;
- maintaining clear, reliable and known cover arrangements when the DSL is unavailable so that concerns can be received, monitored and acted on without delay;
- arranging adequate safeguarding cover for authorised College activities taking place outside normal hours or during college closure periods; and
- maintaining current knowledge and skills through relevant internal and external training, professional networks and engagement with safeguarding partners.

9.3 The College does not replace the emergency services or local authority emergency safeguarding services. Outside College operating hours, anyone who believes a learner is in immediate danger must contact the Police on 999.

9.4 Other urgent concerns should be reported through the relevant local authority emergency duty service or published safeguarding route. The College Safeguarding Team must be informed as soon as practicable.

10.0 The role of college staff

10.1 All College staff must:

- read and understand Part One of Keeping Children Safe in Education, the College's Safeguarding Policy and Procedures, the Staff Code of Conduct and know the identity and role of the DSL and deputies;
- complete safeguarding and child protection training, including online safety and relevant filtering and monitoring responsibilities, as part of their induction;
- complete regularly updated safeguarding training and receive safeguarding and online-safety updates as required and at least annually;
- maintain an attitude that safeguarding concerns can arise in any setting and act in the best interests of the learner;
- report safeguarding concerns immediately through the College's safeguarding referral system and inform the DSL, a deputy DSL or a member of the Safeguarding Team;
- not assume that another person will report or act on a concern;
- take immediate action where a learner is suffering or likely to suffer harm;
- make a direct referral to local authority Children's Social Care or the Police, when necessary, particularly if the DSL or a deputy is unavailable, and inform the DSL as soon as practicable;
- record concerns clearly, factually and promptly, distinguishing between what was observed, what was reported and any professional opinion;
- maintain appropriate confidentiality while recognising that data-protection law does not prevent necessary safeguarding information from being shared;
- report concerns or allegations about staff, volunteers, contractors or other adults through the College's allegations or low-level-concerns procedure;
- report poor or unsafe safeguarding practice through the College's whistleblowing arrangements;
- follow approved arrangements for visitors and contractors, including identity checks, signing-in procedures, identification badges, safeguarding information and appropriate supervision;
- ensure visitors for whom they are the designated host remain appropriately supervised according to the purpose of the visit and the College's risk assessment; and
- comply with the College's relevant safeguarding, health and safety, information security, acceptable-use and visitor-management procedures.

11.0 City of Wolverhampton College recognises that:

- all staff have a responsibility to provide a safe environment in which learners can learn and work;
- all staff must maintain an attitude that safeguarding concerns can arise in any setting and must act in the best interests of the learner;
- staff must exercise professional curiosity and remain aware that learner may not feel ready or know how to disclose abuse, exploitation or neglect and may not recognise their experiences as harmful;
- all staff, trainee teachers, agency and supply staff, and volunteers must receive safeguarding and child protection training appropriate to their role, including online safety and relevant filtering and monitoring responsibilities, as part of their induction;

- College staff must undertake formal safeguarding refresher training at least every two years and must receive safeguarding and child protection updates, including online safety, as required and at least annually;
- all staff must read and understand Part One of Keeping Children Safe in Education. College leaders and staff who work directly with children must also read Annex A. Staff must be informed of relevant changes to statutory guidance and College procedures and apply them in their professional practice;
- all staff must understand:
  - the College's Safeguarding Policy and Procedures;
  - the Staff Code of Conduct;
  - the College's procedures for responding to child-on-child abuse;
  - the safeguarding response to children who are absent from education, particularly on repeated occasions or for prolonged periods;
  - the identity and role of the DSL and safeguarding team;
  - the College's safeguarding reporting system;
  - the allegations, low-level-concerns and whistleblowing procedures; and
  - the local criteria and processes for Family Help and statutory children's social care intervention;
- staff must be able to recognise and respond to indicators of abuse, neglect, exploitation and other safeguarding concerns, whether these arise inside or outside the college, inside or outside the home, or online;
- staff must understand that safeguarding concerns rarely occur in isolation and that several risks or forms of harm may overlap;
- staff must know how to respond if a learner reports abuse, exploitation or neglect, including listening carefully, not asking leading questions, not promising confidentiality and making a prompt, accurate and factual record;
- a learner making a report must be taken seriously, supported and kept safe and must never be made to feel that they are creating a problem or feel ashamed for making a report;
- any staff member who has a concern about a learner's welfare must act on it immediately and follow the reporting and referral procedures;
- concerns should normally be reported immediately through the College's safeguarding system and brought to the attention of the DSL or the Safeguarding Team;
- consultation with the Safeguarding Team must never delay protective action or an appropriate referral. Where a learner is suffering or likely to suffer harm, a referral to local authority Children's Social Care and, where appropriate, the police must be made immediately;
- any member of staff may make a direct referral to Children's Social Care or the Police. If a referral is made directly, the DSL or safeguarding team should be informed as soon as practicable;
- staff must not assume that a colleague or another professional will act or share information that may be critical to keeping a learner safe;
- staff making referrals will be supported by the DSL or Safeguarding Team and must cooperate appropriately with social workers, police and other agencies following a referral; and

- data-protection law does not prevent information being shared for safeguarding purposes. Staff must share relevant information appropriately and must not allow uncertainty about information sharing to delay action needed to protect a child.

12.0 Support before statutory intervention

12.1 All staff should be prepared to identify learners who may benefit from support before statutory intervention.

12.2 This may include support from universal services, community-based Early Help or the targeted early-help level of Family Help. Family Help provides support when problems emerge and may include targeted early help and services delivered to children in need under section 17 of the Children Act 1989.

12.3 Any learner may benefit from additional support. Staff should be particularly alert to the potential need for support for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs, whether or not they have a statutory Education, Health and Care Plan;
- has a mental health need;
- is a young carer;
- is pregnant or is a parent;
- has exhibited early signs of abusive, violent or harmful behaviour;
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement, organised crime or county lines;
- is frequently missing or goes missing from education, home or care;
- has been repeatedly removed from the classroom, has experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion or is receiving Alternative Provision;
- is at risk of exploitation, modern slavery or trafficking, including criminal, sexual or financial exploitation;
- is at risk of being radicalised into terrorism;
- has a parent or carer in custody or is affected by parental offending;
- is experiencing family circumstances that present challenges, including drug or alcohol misuse, adult mental ill-health or domestic abuse;
- is misusing alcohol or drugs;
- is at risk of honour- or faith-based abuse, including female genital mutilation or forced marriage; or
- is privately fostered.

12.4 The College also recognises that additional attention or support may be required for a learner who:

- is looked after, was previously looked after or is otherwise care-experienced;
- is living in kinship care; or
- has returned to their family following a period in care.

12.5 The presence of one or more of these circumstances does not necessarily mean that abuse or neglect has occurred. Staff must consider the learners individual

circumstances, remain professionally curious and report concerns in accordance with this policy.

13.0 Child-on-child abuse, including harassment and violence

13.1 All staff must recognise that children can abuse other children. This is referred to in this policy as “child-on-child abuse” and may occur:

- between two children or within a group;
- inside or outside the College;
- during travel to or from the College;
- in the community;
- face-to-face or online; and
- simultaneously online and offline.

13.2 For the purposes of KCSIE, “child-on-child” relates to children under the age of 18. Where one or more of the learners involved are aged 18 or over, the College will respond in accordance with its safeguarding, behaviour, disciplinary, and other relevant procedures, depending on the circumstances.

13.3 Even where no cases have been reported, staff must not assume that child-on-child abuse is not occurring. It may be taking place but not being reported. Any concern, including one relating to conduct outside the College or online, must be reported promptly to the DSL or the safeguarding team.

13.4 Child-on-child abuse is a safeguarding concern for the victim and the alleged perpetrator. The College will consider the safety, welfare and support needs of everyone affected.

13.5 Child-on-child abuse may include, but is not limited to:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying; see the College’s Bullying and Harassment Policy and Procedure;
- abuse within intimate personal relationships between children, sometimes referred to as teenage relationship abuse, including physical, sexual, emotional or financial abuse, coercive or controlling behaviour and stalking;
- physical abuse, including hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm, including online conduct that facilitates, threatens or encourages physical abuse;
- serious physical assault or harm, or the threat of harm involving a weapon;
- harmful sexual behaviour;
- sexual violence, including rape, assault by penetration and sexual assault, including online conduct that facilitates, threatens or encourages sexual violence;
- sexual harassment, including sexual comments, remarks, jokes, unwanted sexual conduct and online sexual harassment, whether occurring as a standalone incident or as part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, including forcing someone to undress, touch themselves sexually or engage in sexual activity with another person;

- consensual or non-consensual making or sharing of nudes or semi-nudes, including images that have been digitally altered or generated using artificial intelligence, such as deepfakes or “deep nudes”;
- sharing unwanted explicit material, abusive images or pornography;
- upskirting, which is a criminal offence and typically involves taking an image under a person’s clothing without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or to cause humiliation, distress or alarm; and
- initiation or hazing-type violence and rituals, including activities involving harassment, abuse or humiliation as a means of initiating someone into a group, whether face-to-face or online.

13.6 All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether described as consensual or non-consensual. The response must be proportionate and consider the age, development and circumstances of those involved and any evidence of coercion, exploitation or vulnerability.

13.7 Staff must challenge abusive and inappropriate behaviour. Such conduct must never be dismissed as “banter,” “just having a laugh,” “part of growing up” or “boys being boys.” Downplaying it can create an unsafe culture in which abuse, harassment and misogyny are normalised.

13.8 Child-on-child abuse can affect any child. For some forms of child-on-child abuse, girls are more likely to be victims and boys more likely to be perpetrators; however, assumptions must not be made based on sex or gender. All reports must be taken seriously and assessed according to the individual circumstances.

13.9 Staff must recognise that:

- learners of any sex may be victims or alleged perpetrators;
- alleged perpetrators may themselves have unmet safeguarding or welfare needs;
- boys may be less likely to report sexual abuse because of stigma or fear that they will not be believed;
- learners may be affected by racism, sexism, misogyny, misandry, homophobia, biphobia, disability discrimination or other forms of prejudice; and
- abuse may involve differences in age, developmental stage, social status, popularity, economic position, disability or other imbalances of power.

14.0 Harmful sexual behaviour, sexual harassment and sexual violence

14.1 Harmful sexual behaviour (HSB) may occur between learners of any age and sex, from one learner or a group towards another learner or group. It can occur face-to-face, verbally or online and exists on a continuum that may escalate into sexual harassment or sexual violence.

14.2 The College operates a zero-tolerance approach to sexual harassment and sexual violence. This means that all reports will be taken seriously and addressed appropriately; it does not mean that every incident will receive the same response or sanction.

14.3 When considering HSB, staff must take account of:

- the ages and developmental stages of those involved;
- the nature, frequency and context of the behaviour;
- any difference in age, power or vulnerability;
- whether coercion, force, threats or exploitation were involved;
- whether the behaviour forms part of a wider pattern;
- the effect on the victim and other learners; and
- the safeguarding and support needs of the victim, alleged perpetrator and any other affected children.

14.4 Girls are more likely to experience sexual harassment and sexual violence, and boys are more likely to perpetrate it, but any learner may be affected. Learners with disabilities are at increased risk of abuse. Learners who are lesbian, gay or bisexual, or who are perceived to be, may also be vulnerable to discriminatory bullying. The College will respond to each learner's needs and circumstances without making assumptions.

14.5 Victims must be reassured that they are being taken seriously, supported, and kept safe. They must never be blamed, made to feel ashamed or made to feel that they are causing a problem by reporting abuse.

14.6 The College recognises that child-on-child abuse is preventable and will take a proactive, whole-College approach to identifying risk, challenging harmful attitudes and behaviours and providing timely, evidence-based support.

14.7 Standards of acceptable and expected behaviour will be explained to all learners during induction and reinforced through the Student Positive Behaviour Policy, curriculum, tutorials and staff practice.

14.8 Learners will participate in age-appropriate activities throughout the academic year that promote safeguarding, healthy relationships, consent, equality, respect, online safety and ways to seek help.

14.9 Learners will have access to appropriate online and face-to-face tutorial content and accessible reporting routes.

14.10 Appropriately trained safeguarding staff will support staff training, professional development and awareness activities.

14.11 The College will:

- monitor safeguarding, behaviour, attendance and pastoral information for patterns or locations of concern;
- consider when and where learners may be at greatest risk, including around travel and the start and end of the College Day;
- listen to learners and consult staff about where they feel unsafe;
- ensure reporting routes are well promoted, easily understood and accessible;
- provide appropriate support for victims, alleged perpetrators and other affected learner; and
- work with parents, carers and external partners where appropriate.

15.0 Serious violence and criminal exploitation

15.1 All staff must be alert to indicators that a learner may be at risk of, or involved in, serious violence or criminal exploitation. Indicators may include:

- increased or persistent absence from college;
- changes in friendships or relationships, particularly with older individuals or groups;
- a significant decline in attendance, engagement or educational performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries;
- unexplained gifts, money, phones, clothing or other possessions;
- evidence of debt, coercion, threats or being required to carry out tasks for others;
- carrying, threatening with or using a weapon;
- association with criminal networks, organised crime groups, gangs or county lines; or
- periods of being missing from education, home or care.

15.2 The risk of involvement in serious violence may be increased where a learner:

- has experienced disrupted education, suspension, permanent exclusion or Alternative Provision;
- has experienced abuse, neglect or other maltreatment;
- has previously offended, including theft or robbery;
- began using drugs or alcohol at an early age; or
- has previously been a victim or perpetrator of violence.

15.3 Learners involved in serious violence or criminal activity may themselves be victims of exploitation. Staff must respond to their safeguarding needs and must not allow offending behaviour to obscure possible coercion, abuse or exploitation.

15.4 Any concern about a learner carrying or using a weapon, or expressing an intention to do so, must be reported immediately to College Security. Security will assess the risk to the learner and others and determine whether police involvement or another safeguarding response is required.

16.0 Overlapping safeguarding concerns

16.1 All staff must recognise that abuse, neglect, exploitation and other safeguarding concerns rarely occur in isolation. Different risks may overlap, and technology may facilitate or intensify abuse occurring both online and face-to-face.

16.2 Staff must consider the learner's circumstances as a whole and share relevant information so that patterns, cumulative harm, and wider contextual risks can be identified.

16.3 Abuse, neglect, exploitation and other adverse or traumatic experiences can have a lasting effect throughout childhood, adolescence and adulthood.

16.4 Staff should understand that trauma may affect a learner:

- mental and physical health;
- emotional wellbeing;
- behaviour and relationships;
- attendance and engagement;
- ability to concentrate and learn; and
- educational attainment and longer-term outcomes.

16.5 Behaviour that appears challenging may communicate an unmet need or experience of harm. This does not remove appropriate behavioural expectations, but it should inform a proportionate, supportive and trauma-aware response.

17.0 Mental health and safeguarding

17.1 Mental health difficulties may develop into safeguarding concerns, including where there is self-harm, an eating disorder, suicidal ideation or a risk of suicide. They may also indicate that a learner has suffered or is at risk of suffering abuse, neglect, exploitation or trauma.

17.2 Only appropriately trained professionals should diagnose a mental health condition. Staff should:

- observe and identify changes that may indicate a learner is experiencing, or is at risk of developing, a mental health difficulty;
- take disclosures and warning signs seriously;
- record and report concerns promptly;
- discuss concerns that are also safeguarding concerns with the DSL, or the Safeguarding Team; and
- follow the College's safeguarding, mental health and emergency procedures.

17.3 Potential warning signs may include significant changes in behaviour, persistent difficulty sleeping, withdrawal from social situations, loss of interest in usual activities, physical signs of self-harm or signs that the learner is neglecting themselves.

17.4 If there is an immediate danger to life or a serious risk of harm, staff must call 999 or arrange urgent attendance at an Accident and Emergency department in accordance with college procedures. Where urgent mental health assistance is needed, but the situation is not an emergency, advice may be obtained through the safeguarding team.

18.0 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
Sophie Meacham	Head of Human Resources For allegations against staff only	01902 821230 meachams@wolvcoll.ac.uk
Dionne Barrett	Designated Safeguarding Governor	barrettd@wolvcoll.ac.uk

19.0 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
Multi-Agency Safeguarding Hub (MASH)	To report any concerns about a child's safety or well-being, contact 01902 555392. 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. Remember, if you aren't sure whether or not to call the MASH, do it: always do something rather than nothing! 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.

Contact	Details
	Once a telephone referral has been made, the staff member must complete and submit the Multi-Agency Referral Form to MASH within 24 hours. 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. Out of hours please call Emergency Duty Team on 01902 552999. Please note this number is for urgent matters only, where an adult or a child is at immediate risk. Should you fear for someone's safety, then please call 999
Police Central Referral Unit	0345 1135 000 or if immediate action is needed (999)
CTU Police Haroon Akhlaq (Rooney)	West Midlands CTU West Midlands Police 07393142188 haroon.akhlaq@west-midlands.pnn.police.uk If immediate action is needed (999)
Prevent & Cohesion Co-Ordinator Deborah Smith	07870407063 Deborah.Smith@wolverhampton.gov.uk

20.0 Safeguarding Procedures

20.1 This section explains how staff must respond to a safeguarding concern or when a learner discloses possible abuse, neglect, exploitation or another form of harm.

20.2 Information about an applicant's or learner's criminal conviction will normally be considered under the College's Criminal Convictions Procedure. However, if the information indicates that a child, adult at risk or another person may be at risk of harm, the matter must also be reported immediately under this Safeguarding Policy.

20.3 Administrative, admissions or disciplinary procedures must never delay action required to protect a person from harm.

21.0 Safeguarding Principles

21.1 When responding to a concern or disclosure, staff must:

- act in the best interests of the learner;
- take all concerns and disclosures seriously;
- act immediately where someone is in danger or at risk of harm;
- listen without investigating;
- maintain appropriate confidentiality without promising secrecy;
- record and share relevant information promptly;

- consider the wishes and feelings of the learner while recognising that these cannot override the duty to protect them or others; and
- follow the College's safeguarding reporting and referral procedures.

21.2 A child is anyone under the age of 18. Concerns about an adult at risk must be handled under the College's adult-safeguarding arrangements and the applicable local authority procedures.

22.0 Responding to a disclosure

22.1 If a learner is in immediate danger, requires urgent medical attention or there is an immediate risk to life:

- call 999;
- obtain appropriate first aid or medical assistance;
- take reasonable steps to keep the person and others safe;
- preserve possible evidence and do not confront an alleged perpetrator; and
- inform the DSL or safeguarding team as soon as possible.

22.2 Where a learner is suffering or likely to suffer harm, a referral to local authority children's social care and, where appropriate, the police must be made immediately. Anyone can make a referral. Staff should refer to the procedure flowchart in Annex B.

23.0 Receiving a disclosure

23.1 When a learner makes a disclosure, staff must:

- listen carefully and remain calm;
- give the person their full attention and allow them time to speak;
- take the disclosure seriously;
- reassure them that they have done the right thing by telling someone;
- explain that they are not responsible for the abuse or harm;
- not express disbelief, shock, anger or personal opinions;
- not make assumptions or judgements;
- not promise confidentiality or secrecy;
- explain, in an age-appropriate and accessible way, that information must be shared with people who can help keep them or others safe;
- explain who will normally be informed, unless doing so would increase risk or interfere with an investigation;
- not interview or investigate;
- ask only the minimum open questions required to clarify what is being communicated, for example, "Tell me what happened" and avoid leading, repetitive or probing questions;
- not ask the person to repeat their account unnecessarily;
- not contact the alleged perpetrator or the learner's parents or carers without advice from the DSL or the safeguarding team, unless immediate emergency action requires otherwise;
- take account of communication needs, disability, language, age and developmental stage;

- make an accurate record as soon as possible; and
- report the matter immediately through the College's safeguarding system and directly to the DSL or the Safeguarding Team.

23.2 If the disclosure concerns a member of staff, volunteer, contractor, Governor, or another adult working for or on behalf of the College, staff must follow the allegations or low-level concerns procedure. They must not report the matter to the person who is the subject of the concern.

24.0 Recording a disclosure

24.1 The safeguarding record should include:

- the learner's name and identifying information;
- the date, time and place of the disclosure or concern;
- the date and time the record was made;
- the context in which the disclosure arose;
- what was seen, heard or reported;
- the learner's own words wherever possible;
- any visible injuries, without asking the learner to remove clothing or taking photographs on a personal device;
- any questions asked and the answers given;
- the learner's wishes and feelings;
- any immediate action taken; and
- the name and role of each person informed

24.2 Records must be factual and distinguish clearly between:

- direct observation;
- information reported by the learner or another person;
- professional opinion; and
- historical information.

24.3 The College safeguarding reporting form should be used. A lack of immediate access to the system must not delay reporting. Any handwritten notes must be signed, dated, preserved and passed securely to the Safeguarding Team.

24.4 Safeguarding records must be kept confidentially and securely, with access restricted to those who need the information for safeguarding purposes. Records must not be stored informally in personal email accounts, personal devices or unsecured locations.

25.0 Referrals and significant harm

25.1 For children under 18:, where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm:

- local authority children's social care must be contacted immediately;
- the police must also be contacted where a crime may have been committed, or immediate police assistance is required;
- the Wolverhampton Safeguarding Together referral procedure must be followed; and
- action to protect the child and other children must not wait for the outcome or commencement of a statutory assessment or police investigation.

25.2 The DSL or safeguarding team will normally lead or support a referral, but any member of staff can make one. Staff must not assume that a colleague or another professional will take action.

25.3 If the DSL or the Safeguarding Team cannot be contacted, this must not delay a referral. The member of staff should contact children's social care or the police directly and inform the DSL or safeguarding team as soon as practicable.

25.4 If children's social care does not accept a referral and the child's situation does not improve, deteriorates or remains concerning, the DSL or safeguarding team should consider escalating the matter under the local escalation procedure or making a further referral.

25.5 Where the concern relates to a learner aged 18 or over who has care and support needs and is experiencing, or is at risk of, abuse or neglect, staff must immediately inform the Safeguarding Team. A referral to local authority adult social care and, where appropriate, the police must be made in accordance with local adult safeguarding procedures.

25.6 For any learner aged 14–16, the College, relevant school and commissioning local authority must establish clear written arrangements covering:

- respective safeguarding responsibilities;
- the identity and contact details of each DSL;
- the exchange of relevant safeguarding and vulnerability information;
- attendance and absence monitoring;
- notification and escalation thresholds;
- travel arrangements;
- supervision during lessons, breaks and movement between sites;
- emergency and out-of-hours arrangements;
- reporting allegations involving staff;
- managing child-on-child abuse;
- educational visits and off-site activity; and
- arrangements when a placement ends or changes.

25.7 These arrangements must be agreed before the learner begins the programme and reviewed when circumstances change.

25.8 The College manager overseeing the 14–16 learner must work with the home school and relevant local authority to:

- record and monitor attendance at every agreed session;
- share attendance and absence information promptly under the partnership agreement;
- follow up unexplained or repeated absence without delay;
- consider absence as a possible safeguarding indicator;
- escalate concerns through the agreed safeguarding and attendance procedures; and
- notify the home school and local authority promptly if a learner's placement ends, is terminated or changes unexpectedly.

25.9 No learner of compulsory school age should be removed from provision without confirmation that the home school and commissioning authority have been informed, and appropriate education and safeguarding arrangements have been considered.

25.10 Where a 14–16 learner makes a disclosure or a safeguarding concern arises:

- College staff must take any immediate action required to protect the learner;
- the concern must be reported immediately to the College DSL or safeguarding team;
- the College DSL must notify and liaise with the home school's DSL without unnecessary delay, unless doing so would place the child at greater risk or compromise an investigation;
- the DSLs must agree who will lead any referral and how information, support and follow-up will be coordinated;
- uncertainty about which organisation should make a referral must not delay contact with children's social care or the police;
- the College must maintain its own safeguarding record of the disclosure, decisions and action taken; and
- the College must continue to safeguard the learner while the learner attends or remains under the College's supervision.

25.11 The College must not rely solely on the home school to respond to a concern arising within college provision. The commissioning school retains responsibility for safeguarding a child placed in alternative provision, but this does not remove the college's duties while providing education, supervision or support.

25.12 An allegation concerning College staff, volunteers or contractors must be managed under the College's allegations procedure, with appropriate liaison with the LADO and the learner's home school.

25.13 An allegation concerning an employee of the home school or another organisation must be reported to the College DSL, who will liaise with the relevant organisation and LADO. Immediate protective action must not be delayed while responsibility is clarified.

26.0 Informing the Safeguarding Team

26.1 The Safeguarding Team must be informed of every external safeguarding referral as soon as possible. Staff must record:

- the agency and person contacted;
- the date and time of the referral;
- the information shared;
- the advice or decision received;
- agreed actions and responsibility for completing them; and
- arrangements for follow-up.

27.0 Into Employment / Employability and Skills programmes

27.1 Safeguarding concerns involving applicants or learners on SWAP, Gateway, Skills Bootcamps or other into employment / employability programmes must be managed under the same safeguarding principles and reporting requirements as concerns arising in any other College provision.

27.2 The Employability Team must:

- identify and pass safeguarding information to the Safeguarding Team promptly;
- obtain only information necessary for admissions, support, risk assessment and safeguarding purposes;
- not investigate an allegation or disclosure;
- not promise confidentiality;
- ensure urgent concerns are escalated immediately; and
- cooperate with the Safeguarding Team in establishing appropriate support and risk-management arrangements.

27.3 The Safeguarding Team will determine, according to the applicant's or learner's age and circumstances, whether the matter requires:

- internal support;
- a Family Help assessment;
- referral to children's social care;
- referral to adult social care;
- contact with the police;
- contact with a Jobcentre, employer, training provider or other partner;
- a placement or learning risk assessment; or
- another appropriate safeguarding response.

27.4 Where a learner is referred, funded, employed or supported by another organisation (a subcontractor or partnership), relevant safeguarding information may be shared with that organisation where lawful, necessary and proportionate. The subcontractor or partnership must identify:

- each organisation's safeguarding responsibilities;
- reporting and escalation routes;
- responsibility for external referrals;
- arrangements for attendance and unexplained absence;

- work-placement safeguards;
- information-sharing expectations; and
- the support available to the learner.

Administrative responsibility for a programme must never be used as a reason to delay or decline necessary safeguarding action. The procedure flowchart is provided in Annex F.

28.0 Prevent Duty Procedures

28.1 Prevent is one of the four elements of CONTEST, the United Kingdom's counter-terrorism strategy. The four elements are Prevent, Pursue, Protect and Prepare.

28.2 The aim of Prevent is to stop people from becoming terrorists or supporting terrorism and to support the rehabilitation and disengagement of people already involved in terrorism.

28.3 Prevent has three objectives:

1) tackling the ideological causes of terrorism;
2) intervening early to support people who are susceptible to radicalisation; and
3) enabling people who have already engaged in terrorism to disengage and rehabilitate.

28.4 Prevent forms part of the College's wider safeguarding responsibilities towards children, young people and adult learners.

28.5 Statutory duty:

28.5.1 City of Wolverhampton College is subject to section 26 of the Counterterrorism and Security Act 2015. In exercising its functions, the College must have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent duty.

28.5.2 The College will have regard to the current Prevent duty guidance: England and Wales and will implement the duty in a proportionate and risk-based manner.

28.5.3 The College will:

- appoint a senior management lead with responsibility for the strategic delivery of Prevent;
- identify a clear operational Prevent lead and referral route;
- ensure the Governing Body and senior leaders provide appropriate oversight, challenge and assurance;
- ensure the importance of Prevent and the responsibilities associated with it are understood by relevant staff;
- work with the Department for Education regional Prevent coordinator, local authority Prevent lead, police, Wolverhampton Safeguarding Together and other relevant partners;

- cooperate, as far as reasonably practicable, with a local authority-led Channel panel where a referral is adopted;
- maintain appropriate records of Prevent concerns, decisions, referrals and actions; and
- monitor implementation of the Prevent duty and report material concerns or weaknesses through the College's governance arrangements.

28.6 Understanding radicalisation risk

28.6.1 Radicalisation is the process through which a person comes to support terrorism or extremist ideologies associated with terrorist groups.

28.6.2 There is no single profile, checklist, or reliable indicator that shows a person is being radicalised. Concerns must be considered in context and may arise from changes in behaviour, communications or associations.

- expressing support for terrorism, terrorist organisations or terrorist violence;
- accessing, creating or sharing terrorist or extremist material linked to terrorism;
- identification with or fixation on terrorist attackers or ideologies;
- expressing an intention to travel for a terrorism-related purpose;
- attempting to recruit, influence or coerce others;
- withdrawing from existing relationships alongside increasing engagement with extremist influences;
- exposure to radicalising material or individuals online or in person;
- expressing grievances in a way that appears to legitimise terrorist violence;
- using symbols, language or material associated with terrorist organisations;
- significant changes in behaviour combined with other evidence of radicalisation; or
- concerns raised by family members, friends, learners, staff or external agencies.

28.6.3 Relevant factors may include bullying, isolation, family tensions, criminal exploitation, hate crime, identity concerns, personal grievances or poor mental health do not by themselves demonstrate susceptibility to radicalisation. They may, however, be relevant when considered alongside ideological influence, intent or other terrorism-related concerns.

28.6.4 Staff must avoid stereotyping or making assumptions based on a person's religion, race, ethnicity, nationality, political opinion, disability, sex or other protected characteristic.

28.6.5 Prevent addresses all forms of terrorism. The College's response will be ideology-neutral, threat-aware, and informed by the current national and local risk assessments. A Prevent referral does not require a clearly identified ideology.

28.6.6 The College will provide learners with appropriate opportunities to develop the knowledge and skills needed to recognise and resist extremist narratives and radicalising influences.

28.6.7 This will include, as appropriate:

- promoting democracy, the rule of law, individual liberty, and mutual respect and tolerance of people with different faiths and beliefs;
- teaching learners how to evaluate information, recognise manipulation and challenge misinformation, disinformation and conspiracy narratives;
- supporting critical thinking, media literacy and online safety;
- addressing hatred, discrimination, antisemitism, anti-Muslim hatred, racism, misogyny and other harmful or intolerant narratives;
- exploring current terrorism risks and extremist narratives linked to terrorism in a balanced, age-appropriate and non-stigmatising way;
- explaining how online spaces, social media, gaming, artificial intelligence and digitally altered material may be used to spread propaganda or target susceptible people;
- ensuring learners know how to report concerns and obtain support; and
- providing safe opportunities for debate in which controversial issues may be discussed without promoting partisan political views or unlawful speech.

28.6.8 It will not suggest that membership of any religion, ethnicity, nationality, political group or subculture is itself an indicator of radicalisation.

28.6.9 Prevent education will be supported through the curriculum, tutorials, l induction, the Student Code of Conduct, the College's approach to British values and relevant cross-College activities.

28.7 Online safety, filtering and monitoring

28.7.1 The College will take reasonable steps to prevent learners from accessing terrorist and other harmful material through College IT systems without unreasonably restricting legitimate teaching, learning and research.

28.7.2 The College will:

- maintain appropriate filtering and monitoring systems;
- assign clear roles and responsibilities for those systems;
- ensure concerns identified through monitoring are escalated appropriately;
- check that filtering operates effectively across relevant devices, networks and locations;
- review and record the effectiveness of filtering and monitoring arrangements at least once every academic year; and
- consider emerging risks, including encrypted platforms, gaming, generative artificial intelligence and AI-generated extremist or terrorist propaganda.

28.7.3 Technology controls will form part of, and will not replace, education, staff awareness and appropriate safeguarding intervention.

28.8 Staff training

28.8.1 Staff must receive Prevent training at the earliest appropriate opportunity, normally as part of induction. Training must be proportionate to each person's role.

28.8.2 Training and updates will enable staff to:

- understand the Prevent duty;
- understand the current national and local threat;
- recognise possible susceptibility to radicalisation;
- distinguish safeguarding concerns from legitimate political, religious or academic expression;
- understand online radicalisation risks;
- follow the College's internal reporting procedure;
- make an informed and good faith Prevent referral; and
- understand the support available through Channel and other services.

28.8.3 Staff will receive refresher training at intervals determined by risk and role, together with relevant updates during the academic year. The College's DSL and safeguarding team undertake more detailed training covering ideologies, referrals, and Channel, which is updated at least every two years.

28.8.4 Training resources must be appropriate, reliable and obtained from an authoritative or appropriately quality-assured source.

29.0 Reporting a Prevent concern

29.1.1 A concern that someone may be susceptible to radicalisation into terrorism must be treated as a safeguarding concern.

29.1.2 Staff should follow the "Notice, Check, Share" approach:

- **Notice:** identify behaviour or information that may indicate a possible radicalisation concern;
- **Check:** consider the context, record the facts accurately and, where appropriate, discuss the concern with the DSL or Safeguarding Team; and
- **Share:** report the concern promptly through the College's safeguarding system so that it can be assessed and appropriate action taken.

29.1.3 Staff must:

- report facts, observations and the learner's own words rather than assumptions;
- not investigate, conduct ideological tests or search a learner's personal device;
- not confront the learner or accuse them of extremism or terrorism;
- not delay reporting because they are uncertain about the ideology involved; and not promise confidentiality.

29.1.4 Where there is an immediate risk of harm, a suspected terrorist offence or information indicating an imminent threat, staff must contact the police through the appropriate emergency route and inform the DSL or safeguarding team as soon as possible.

29.2 Assessment and referral

29.2.1 The DSL, or Safeguarding Team, will consider:

- the nature and context of the concern;
- whether there is a terrorism-related risk;
- the person's possible susceptibility to radicalisation;
- online and offline influences;
- safeguarding, welfare and mental health needs;
- the risk to the person and others;
- whether further internal information is available lawfully;
- whether advice should be obtained from the local authority Prevent lead, police or Department for Education Prevent coordinator; and
- whether a Prevent referral, another safeguarding referral or alternative support is appropriate.

29.2.2 The College does not need evidence that an offence has been committed or proof of a particular ideology before making a Prevent referral. A referral should be informed, proportionate and made in good faith.

29.2.3 A Prevent referral may be made alongside a referral to children's social care, adult social care, mental health services or the police. Prevent must not replace other necessary safeguarding or emergency action.

29.2.4 The referrer and the basis for the decision must be recorded. Where a decision is made not to refer, the rationale and any alternative support or monitoring arrangements must also be recorded.

30.0 Supporting Employers engaged in Work Experience and Apprenticeships

30.1 Employers offering training opportunities to learners will receive a copy of the Safeguarding Policy and Procedures, along with information on their safeguarding responsibilities.

30.2 Assessors, trainers, or placement officers will conduct risk assessments and include safeguarding and Prevent elements in workplace reviews with learners.

30.3 Staff must report when they become aware of any allegations, suspicions or incidents involving learners on the employer's premises.

30.4 All learners will receive information about safe workplace practices and the Safeguarding Team's contact details.

31.0 Confidentiality

31.1 The learner's welfare 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.

31.2 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 learners' welfare and safety.

32.0 Position of Trust

32.1 All adults working with learners are in a position of trust concerning these learners.

32.2 A relationship between a staff member, volunteer, or contractor and a learner cannot be one between equals. There is potential for exploitation and harm to the learner, and all staff are responsible for ensuring that an unequal power balance is not used for personal gain.

32.3 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.

32.4 Staff should avoid behaviours that might be misinterpreted by others and adhere to the staff code of conduct, see Annex E.

33.0 Allegations of abuse against staff and other adults

33.1 Scope and harm threshold

33.1.1 These procedures apply to allegations concerning anyone working for or on behalf of the College, whether paid or unpaid, including:

- permanent and temporary staff;
- agency and supply staff;
- trainee teachers;
- volunteers;
- governors;
- contractors and consultants;
- partners and subcontractor staff; and
- employers or placement staff where the allegation relates to their contact with a child through college provision.

33.1.2 These procedures must be followed where it is alleged that a person has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or relating to a child;
- behaved towards a child or children in a way indicating that they may pose a risk of harm to children; or
- behaved or possibly behaved in a way indicating that they may not be suitable to work with children.

33.1.3 The final criterion includes behaviour that may have occurred outside the College and may not involve a child, for example, domestic abuse where it raises a transferable risk or calls into question the person's suitability to work with children.

33.1.4 These criteria are referred to as the "harm threshold."

33.1.5 Concerns about an adult that do not meet the harm threshold must be managed under the College's Low-Level Concerns Procedure. If there is any doubt about whether the harm threshold is met, the College will seek advice from the Local Authority Designated Officer ("LADO").

34.0 Governing principles

34.1 The College recognises its duty of care to learners and its employees.

34.2 Allegations will be managed in a manner that:

- safeguards the learner who may be at risk;
- supports the person who is the subject of the allegation;
- applies common sense and professional judgement;
- deals with allegations promptly, thoroughly and fairly;
- preserves evidence and does not compromise a police or children's social care investigation;
- maintains appropriate confidentiality;
- avoids unnecessary delay; and
- complies with KCSIE, local LADO procedures and employment law.

34.3 The welfare of the child is paramount. At the same time, an allegation does not establish that the person concerned has committed misconduct or a criminal offence.

35.0 Reporting an allegation

35.1 An allegation or concern that may meet the harm threshold must be reported immediately to the Principal.

35.2 Where the allegation concerns the Principal, it must be reported directly to the Chair of Governors, without first informing the Principal.

35.3 Where the allegation concerns the Chair of Governors, or there is a conflict of interest, it must be reported to the clerk of governors and advice sought from the LADO.

35.4 Staff must not:

- investigate the allegation;
- ask the learner or witnesses detailed or leading questions;
- confront or inform the person who is the subject of the allegation;
- promise confidentiality;
- discuss the matter with colleagues who do not need to know; or
- delay reporting while attempting to establish whether the allegation is true.

35.5 A factual record must be made promptly, including the learner's own words wherever possible, the date, time and circumstances of the report and any immediate action taken.

36.0 Case manager and safeguarding roles

36.1 The Principal will normally act as the case manager where an allegation is made regarding a member of staff. Where the allegation concerns the Principal, the Chair of Governors will act as case manager.

36.2 The case manager is responsible for:

- discussing the nature, content and context of the allegation with the LADO;
- agreeing the course of action with the LADO and, where involved, the police and children's social care;
- coordinating the College's response;
- ensuring appropriate employment and governance processes are followed;
- monitoring the progress of the case; and
- ensuring decisions and their rationale are recorded.

36.3 The DSL or a deputy is responsible for:

- ensuring the learner is safe;
- making or supporting referrals to children's social care where required;
- assessing and coordinating the learner's safeguarding and support needs;
- supporting information sharing with safeguarding agencies.

36.4 Human Resources will advise and support the case manager on employment matters, staff welfare, disciplinary procedures and communication with the person who is the subject of the allegation.

36.5 The DSL should not investigate the allegation or act as a case manager, where doing so would create a conflict with their responsibility to safeguard and support the child.

36.6 The case manager must promptly contact the LADO where an allegation meets or may meet the harm threshold. The case manager and LADO will consider:

- the nature, content and context of the allegation;
- whether the allegation meets the harm threshold;
- whether a child is suffering or likely to suffer significant harm;
- whether a criminal offence may have been committed;

- the immediate safety of the child and other children;
- any previous allegations, concerns or relevant patterns;
- whether the person presents a transferable risk in another role or setting;
- whether a strategy discussion is required;
- what information may be shared and with whom;
- when and how the person concerned and parents or carers should be informed;
- whether restrictions, redeployment or suspension should be considered; and
- how and by whom any further enquiries or investigation will be conducted.

36.7 The LADO's role is to provide advice, oversight and coordination. The LADO does not normally conduct the investigation.

36.8 If the initial discussion concludes that no further action is required under the allegation's procedure, the case manager and LADO will record the decision, the reasons for it and the information to be provided in writing to the person concerned. The College will consider whether the matter should instead be addressed under its Low-Level Concerns Procedure, Staff Code of Conduct or employment procedures.

37.0 Immediate safeguarding and external referrals

37.1 Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, the DSL or a deputy must make an immediate referral to local authority children's social care. The police must also be contacted where a crime may have been committed, or immediate police assistance is required.

37.2 The College must take immediate and proportionate action to safeguard the learner. It must not wait for the outcome or commencement of a statutory or criminal investigation before putting protective arrangements in place.

38.0 Investigation and disciplinary processes

38.1 The College must not commence a disciplinary investigation before consulting the LADO where the harm threshold may be met.

38.2 Where further enquiries are required, the LADO and case manager will agree:

- whether the police, children's social care, the College or an independent investigator will investigate;
- the sequence of the respective processes;
- arrangements for sharing evidence;
- steps required to avoid prejudicing another investigation; and
- review and communication arrangements.

38.3 An internal disciplinary process is separate from police or children's social care enquiries and applies a different standard of proof. The College may need to consider disciplinary action after a criminal investigation has concluded, even where no charge is brought or a person is acquitted.

38.4 The case manager must monitor progress so that the matter is handled as quickly as possible through a thorough and fair process. Wherever possible:

- the first review should take place no later than four weeks after the initial assessment; and
- if the investigation continues, subsequent reviews should take place ideally every two weeks and no less frequently than monthly.

38.5 Timescales may depend on the nature, seriousness and complexity of the case and on external agency processes.

39.0 Agency, supply, trainee and contracted staff

39.1 The College will ensure allegations involving agency, supply, trainee or contracted staff are addressed properly and will not cease using the person's services merely as an alternative to investigation.

39.2 The College will normally take the lead in gathering information because the individual worked under its supervision, direction or control and the College has direct access to children, witnesses and relevant records.

39.3 The case manager will liaise with:

- the employing agency or contractor;
- the relevant teacher-training provider;
- the LADO;
- the police or children's social care, where involved; and
- Human Resources.

39.4 The employing organisation must be involved in relevant meetings and decisions. Responsibilities for investigation, support, suspension or removal from duties, and any required statutory referral must be clearly agreed.

40.0 Confidentiality, information sharing and publicity

40.1 The College will make every reasonable effort to maintain confidentiality and guard against unwanted publicity while an allegation is under consideration or investigation.

40.2 Information will be shared only with those who need it to safeguard children, conduct the investigation, support the people involved or discharge a legal duty.

40.3 The case manager will agree with the LADO and, where involved, the police and children's social care:

- who needs to know about the allegation;
- what information may be shared;
- how speculation, leaks or gossip will be managed;
- what information, if any, may be given to the wider College community; and
- how media enquiries will be handled.

40.4 Staff must not publish or share information about an allegation through social media or any other public or private forum.

40.5 The College will have regard to any applicable statutory reporting restrictions. It will not promise absolute confidentiality where disclosure is necessary to protect a child, conduct a fair process or comply with the law.

41.0 Informing and supporting the person who is the subject of the allegation

41.1 The timing of informing the person concerned must be considered carefully with the LADO and, where appropriate, the police and children's social care. Information must not be shared if doing so may place a learner at further risk or prejudice the gathering of evidence or an external investigation.

41.2 Subject to that advice, the College will:

- inform the person of the allegation as soon as possible;
- explain the likely course of action;
- advise them to contact their trade union representative or another appropriate colleague for support;
- appoint a named contact to keep them informed of progress;
- provide access to occupational health, counselling or other welfare support where appropriate;
- explain the confidentiality requirements; and
- provide written confirmation of relevant decisions where appropriate.

41.3 The College will manage and minimise the stress caused by the allegation. If the person is suspended, social contact with colleagues and friends will not normally be prohibited unless there is evidence that such contact may prejudice the gathering of evidence.

42.0 Informing and supporting parents or carers

42.1 Subject to advice from the LADO and, where involved, the police and children's social care, the parents or carers of a child involved will be formally informed of the allegation as soon as possible.

42.2 The College will:

- explain what information can be shared;
- keep parents or carers informed of progress only in relation to their child;
- not share confidential employment information about the person who is the subject of the allegation;
- explain any applicable confidentiality or reporting restrictions; and
- provide or arrange appropriate support for the child.

42.3 Where informing a parent or carer may place the child at additional risk or prejudice an investigation, the College will follow the advice of children's social care and the police.

42.4 Where the learner is aged 18 or over, information will not normally be shared with parents or carers without the learner's consent unless there is a lawful safeguarding reason to do so.

43.0 Suspension and alternative arrangements

43.1 Suspension must not be an automatic response to an allegation.

43.2 The case manager must consider whether temporary safeguards could manage the identified risk, including:

- redeployment away from direct contact with learner;
- providing an additional adult when contact occurs;
- alternative duties or location;
- restrictions on specified activities, systems or premises; or
- changes to timetables or working arrangements.

43.3 Moving the learner should be considered only where it is in their best interests, considers their wishes, and does not appear punitive.

43.4 Suspension should be considered only where there is cause to suspect that a child or other children are at risk of harm or the allegation is so serious that there may be grounds for dismissal. The case manager should seek advice from Human Resources and the LADO and give appropriate weight to the views of the police and children's social care where involved.

43.5 If suspension is considered necessary, the decision-maker must record:

- the assessed risk;
- the reasons for suspension;
- the alternatives considered; and
- why those alternatives were rejected.

43.6 Suspension is a neutral act and not a finding of guilt.

44.0 Outcomes and referrals

44.1 At the conclusion of the process, the allegation will be recorded using the applicable KCSIE outcome:

- **substantiated:** sufficient evidence proves the allegation;
- **malicious:** sufficient evidence disproves the allegation and there has been a deliberate act to deceive or cause harm;
- **false:** sufficient evidence disproves the allegation;
- **unsubstantiated:** insufficient evidence either to prove or disprove the allegation; or
- **unfounded:** no evidence or proper basis supporting the allegation.

44.2 An unsubstantiated, unfounded, false or malicious outcome must not be interpreted automatically as evidence that the child deliberately made a false allegation. The College and LADO will consider whether the child or person making the report requires support or may have experienced harm from another source.

44.3 Where the relevant legal conditions are met, the College will make a referral to the Disclosure and Barring Service. Where applicable, it will also consider referral to the Teaching Regulation Agency or another professional regulator.

44.4 A resignation, termination of services or settlement agreement will not prevent the College from completing the safeguarding process or making a required referral.

45.0 Records, references and learning lessons

45.1 A clear and comprehensive summary of the allegation must be retained on the confidential personnel file, including:

- how the allegation was followed up;
- decisions reached and their rationale;
- the outcome; and
- action taken.

45.2 Records must be retained in accordance with KCSIE and the College's retention schedule.

Substantiated safeguarding allegations meeting the harm threshold should be included in employment references where required, provided the information is factual. Allegations found to be false, unfounded, unsubstantiated or malicious must not be included in references.

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 be aware of safeguarding issues that can put learners 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 disproportionally 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. Exploitation may be facilitated by organised criminal networks and may constitute modern slavery.

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 the 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

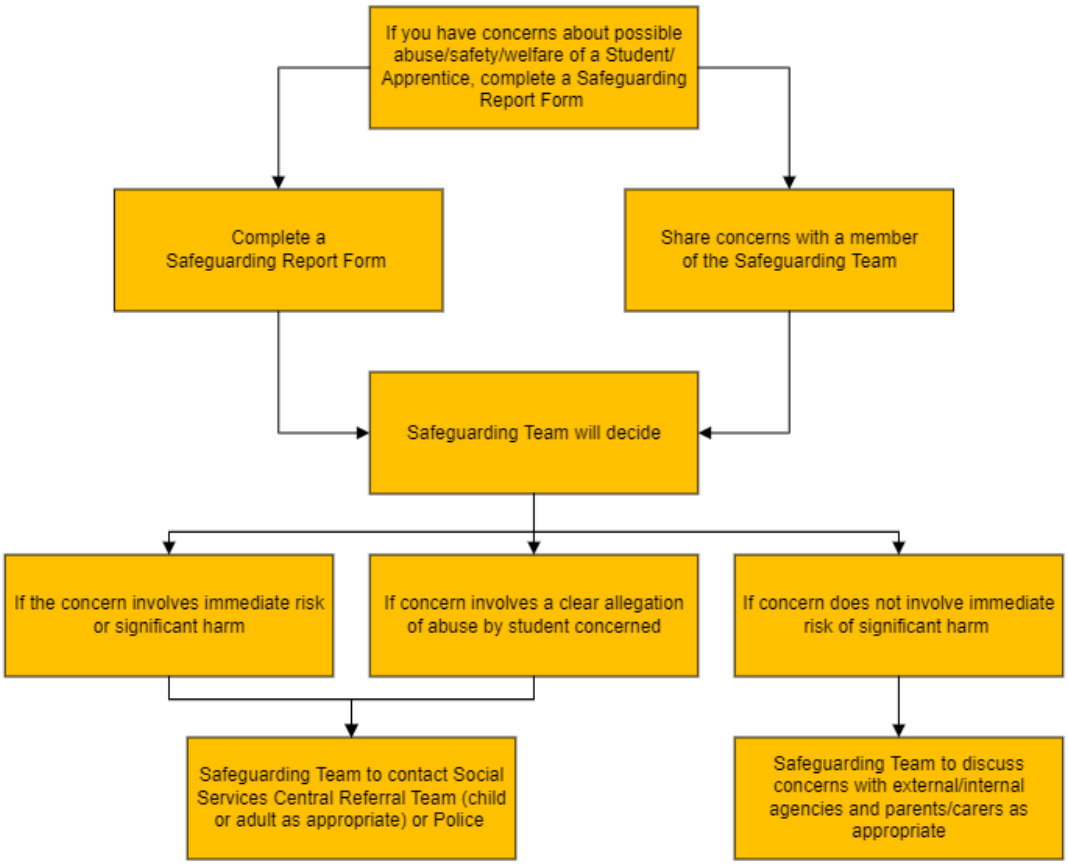
Teenage relationship abuse

Trafficking

Annex B – City of Wolverhampton College Safeguarding Procedure

In line with Keeping Children Safe in Education, 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 learner 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 learner.

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 managing 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 be transparent about your decisions and 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 –Staff Code of Conduct

This Code applies to everyone working for or on behalf of the College, whether paid or unpaid, including permanent, temporary, agency and supply staff; managers; teachers; support and administrative staff; contractors; governors; volunteers; trainees; and visitors undertaking work with learners. The term “staff” is used throughout for ease of reference.

The Code establishes the standards of conduct expected of staff and is intended to:

- safeguard learners;
- promote a culture of safety, openness, trust and transparency;
- help staff maintain appropriate professional boundaries;
- ensure concerns are identified, reported and addressed promptly; and
- reduce the risk of conduct being misunderstood or misinterpreted.

The Code applies to all staff interactions with all learners, irrespective of age.

All staff must read Part One of Keeping Children Safe in Education and complete safeguarding training required for their role.

Related policies and procedures

This Staff Code of Conduct establishes the standards of professional behaviour expected of everyone working for or on behalf of the College. It should be read alongside the College’s related policies, procedures, and guidance, including those listed below. This list is not exhaustive, and staff are responsible for familiarising themselves with all policies relevant to their role.

- Safeguarding Policy and Procedures;
- Whistleblowing Policy;
- Disciplinary and Capability Policy and Procedure;
- Grievance Policy and Procedure;
- Equality, Diversity and Inclusion Policy;
- Dignity at Work, Anti-Bullying and Harassment Policy;
- Health and Safety Policy;
- Data Protection Policy;
- Acceptable Use of IT Policy;
- Social Media Policy

Staff must comply with this Code and all related College policies and procedures. Where there is any uncertainty about the appropriate course of action, staff should seek advice from their line manager, Human Resources, the Designated Safeguarding Lead or another appropriate senior manager.

Any concern or allegation about the conduct of a person working for or on behalf of the College must be reported promptly in accordance with the Safeguarding Policy and Procedures and the College’s arrangements for allegations and low-level concerns. Staff must not investigate the matter themselves, confront the person concerned or discuss it with anyone who does not need to know.

Staff must:

- act in the best interests of learners and maintain appropriate professional boundaries;
- behave in a manner that would withstand reasonable public scrutiny;
- avoid conduct that could lead a reasonable person to question their motives, intentions or suitability to work with learners;
- treat learners fairly and with dignity and respect;
- model respectful, inclusive and non-discriminatory behaviour;
- challenge bullying, harassment, sexual harassment, prejudice-based behaviour and discrimination;
- maintain an attitude that safeguarding concerns can arise in any setting;
- wear their college identification badge visibly while on college premises, subject to any agreed safety exception;
- follow the College's arrangements for signing in and supervising visitors and contractors;
- follow approved risk assessments and health and safety arrangements for activities, premises, visits and trips; and
- Seek advice from their line manager, the Designated Safeguarding Lead (DSL) or Human Resources whenever they are uncertain about professional conduct or safeguarding responsibilities.

Staff must not:

- abuse, neglect, harass, intimidate, humiliate or discriminate against a learner;
- use degrading, threatening, sexualised, aggressive or otherwise inappropriate language;
- establish or seek to establish an improper emotional, physical, sexual or financial relationship with a learner;
- use their position to obtain personal advantage or cause detriment to a learner or the learner's family;
- show favouritism or develop relationships that could be perceived as favouritism;
- impose their personal religious beliefs on learners; or
- promote partisan political views or improperly attempt to influence learners.
- Appropriate, balanced discussion of religious, political and social issues as part of the curriculum or pastoral support is permitted, provided it is conducted impartially and in accordance with the College's legal duties.

Professional boundaries and one-to-one working

Staff must:

- ensure one-to-one meetings take place in an appropriate location that is visible or accessible to others wherever reasonably possible;
- avoid meeting learners in remote or secluded areas;
- use rooms with vision panels or keep doors open where appropriate;
- ensure another member of staff knows when and where a one-to-one meeting is taking place;
- keep the purpose and duration of meetings proportionate; and
- record and report any situation that could be misinterpreted.

Staff must not arrange private meetings with learners away from college premises unless the meeting forms part of an authorised college activity.

Physical contact, personal care and reasonable force

Physical contact must be appropriate, necessary, proportionate to the circumstances and responsive to the learners needs. Staff must never engage in horseplay, tickling, play-fighting or unnecessary physical contact.

Staff providing personal or intimate care must follow the learners agreed care plan and the college's intimate-care procedures.

Reasonable force or restrictive intervention may be used only where lawful, necessary and proportionate and in accordance with college policy. Any use of force or unplanned physical intervention must be recorded and reported.

Sexual conduct and positions of trust

Staff must never:

- engage in a sexual or romantic relationship with a learner;
- make sexual or sexually suggestive comments to or about a learner;
- discuss their own sexual relationships with a learner;
- engage in sexualised communication, jokes, banter or behaviour;
- view, create, possess, request or share sexual images of learners; or
- encourage or respond to sexual or romantic attention from a learner.

Where a member of staff is aged 18 or over and is in a position of trust, it is a criminal offence under section 16 of the Sexual Offences Act 2003 to engage in sexual activity with a child under 18 for whom that position of trust applies, even if the relationship is described as consensual.

Any sexual or romantic attention initiated by a learner must be reported to the appropriate manager or DSL and/or Human Resources and handled sensitively.

Communication, social media and technology

Staff must communicate with learners only for legitimate college purposes and through college-approved systems, accounts and devices.

Staff must not:

- give learners personal telephone numbers, personal email addresses or personal social-media details;
- use personal accounts or unapproved messaging services to communicate with learners;
- accept or send social-media connection or follow requests involving learners;
- create or join an unapproved online group involving learners;
- exchange private, secretive, sexualised or otherwise inappropriate messages;
- use disappearing-message functions when communicating with learners;
- take or store photographs, video or audio recordings of learners on a personal device; or
- access, create, share or retain inappropriate or unlawful material using college equipment or networks.

Online conduct outside working hours must not undermine professional boundaries, disclose confidential information, bring the College into disrepute or call into question a person's suitability to work with learners.

Confidentiality, information sharing and records

Staff must keep learner information confidential and access or share it only for legitimate professional purposes.

Confidentiality must never prevent the sharing of appropriate safeguarding information. Staff should seek advice from the safeguarding team/DSL when uncertain but must not delay sharing information if a learner may be at risk.

Staff must:

- follow the college's safeguarding-recording and data-protection procedures;
- ensure records are accurate, factual, timely and secure;
- verify the identity and authority of anyone requesting learner information; and
- never access or use college information for personal benefit or to the detriment of a learner or family.

Gifts, money and favouritism

Staff must not lend or give personal money to learners, borrow money from them, enter personal financial arrangements with them or accept gifts that could create an obligation or suggest favouritism.

Transporting learners

Staff must not transport learners in a private vehicle unless the College has authorised the journey and appropriate safeguards are in place.

Before an authorised journey, the College must consider:

- whether alternative transport is available;
- the journey's purpose and risk assessment;
- parental or carer consent where appropriate;
- the learner's needs and vulnerability;
- appropriate staffing arrangements;
- insurance permitting business use;
- driving-licence and vehicle-safety requirements; and
- arrangements for emergencies or unforeseen changes.

Avoid one-to-one transport wherever reasonably possible. Any unavoidable emergency journey or departure from the agreed arrangements must be reported and recorded.

Safeguarding disclosures and concerns about learners

Staff must take every safeguarding concern, allegation or disclosure seriously, including concerns arising online or outside college, following the appropriate Safeguarding Policy and Procedures.

Concerns or allegations

All concerns about the conduct of an individual working for or on behalf of the College must be reported, however small they may appear, following the appropriate Safeguarding Policy and Procedures.

An allegation or concern could include:

- harmed or attempt to harm a learner;
- committed or possibly committed a criminal offence against or relating to a learner;
- behaved towards a learner in a way indicating that they may pose a risk of harm; or
- behaved or possibly behaved in a way indicating that they may not be suitable to work with a learner

Staff must not investigate such concerns themselves, confront the person concerned or discuss the matter with colleagues who do not need to know.

A low-level concern is any concern however small, and even if it is no more than a sense of unease, that an individual working for or on behalf of the College may have acted in a way that:

- is inconsistent with this Code, including inappropriate conduct outside work; and
- does not meet the harm threshold for referral under the allegations procedure or is not serious enough initially to appear to meet that threshold.

Examples may include:

- being overfriendly with a learner;
- showing favouritism;
- humiliating or intimidating a learner;
- engaging with a learner one-to-one in a secluded area or behind a closed door;
- using inappropriate language;
- communicating through a personal account;
- taking photographs of a learner on a personal device; or
- conduct that could reasonably be interpreted as sexualised or otherwise inappropriate.

Low-level concerns must be reported. Staff are encouraged to self-refer if they have acted in a way that could be misinterpreted, have found themselves in a situation that may appear compromising, or believe that their conduct may have fallen below the required professional standard.

The term “low-level” does not mean that a concern is insignificant. All concerns will be recorded, reviewed and addressed appropriately so that possible patterns of behaviour can be identified.

Whistleblowing

Staff must report poor or unsafe safeguarding practice and any failure by the College to meet its safeguarding responsibilities.

Concerns should normally be raised through the College's Whistleblowing Policy. Staff who feel unable to raise a concern internally, or who believe that a genuine safeguarding concern has not been addressed, may use an appropriate external whistleblowing route, including the NSPCC Whistleblowing Advice Line.

No member of staff will suffer detrimental treatment for raising a genuine concern in good faith.

Exceptional or emergency circumstances

This Code cannot describe every situation. If immediate action is reasonably necessary to protect a learner from harm, staff should act in the learner's best interests and take only action that is necessary and proportionate.

Report any unavoidable departure from normal procedures as soon as possible to the DSL. The circumstances, decision, action taken and reasons must be recorded.

This does not authorise staff to disregard professional boundaries or safeguarding requirements for convenience.

Advice and compliance

Staff who are uncertain about any aspect of this Code should seek advice from their line manager, Human Resources, the DSL or the Head of Safeguarding and EDI.

A failure to follow this Code may result in action under the College's disciplinary procedures and, where appropriate, referral to the LADO, Disclosure and Barring Service, police, professional regulator or another relevant authority.

Annex F - Safeguarding Referral Process for Into Employment / Employability and Skills Programmes

1

- All referral details of a prospective student - including those from external partners – should be emailed to the Employability Team or in the case of Probation Service (e.g., Maximus UK or similar) should be direct to Lorna Prosser, Curriculum Manager.
- Self-referrals sent to the Construction mailbox and are picked up by the Employability Team direct. If at the Information Session, the 'criminal conviction' details is 'ticked' on the enrolment form, the Safeguarding Team will be notified and will speak with the individual directly at that point.
- If at the Information Session, the 'criminal conviction' details is 'ticked' on the enrolment form, the Safeguarding Team will be notified and will speak with the individual directly at that point.

2

- The Employability Team will record all referral details centrally.
- In the case of candidates from Probation Services, referral details should be emailed to the Safeguarding Team to follow up and start the process of the Risk Assessment.

3

- The Safeguarding Team will contact the prospective student before any attendance in College, including for the Information Session, to gather information and request permission to contact the Probation Officer.
- The Risk Assessment form will be emailed to Probation Officer by the Safeguarding Team.The completed form should be returned by the Probation Officer for the Safeguarding Team for review.

4

- The Safeguarding Team will email Lorna Prosser, Curriculum Manager, to confirm the prospective student has been 'cleared for processing'.
- The Employability Team will then invite the prospective student to attend the next available Information Session.

5

- 'Cleared for processing' is recorded on the referral details. The prospective student will meet with Safeguarding Team to sign the Risk Assessment prior to joining the course..
- Any safeguarding concerns will be addressed prior to prospective student being offered a place.

6

- All Risk Assessments are stored centrally on College's secure system. Only the Safeguarding Team has access. Any concerns around the Risk Assessment will be shared with Curriculum Manager and Partners, if applicable, and only on a need to know basis only.
- During a course, if there are concerns with a student regarding their behavior, attendance etc, the College Student Code of Conduct can be evoked and, where apropriate, the Probation Officer will be informed.