Safeguarding Young People and Adults at Risk Policy & Procedures

TYPE: Policy

PURPOSE: To inform staff, students, parents/ guardians and all other service users of the policy and procedures Solihull College & University Centre and Stratford upon Avon College has in place to ensure that the welfare of young people and adults at risk receiving education and training is safeguarded and promoted.

SCOPE: This policy applies to all students, staff, volunteers, contractors, governors and visitors

RESPONSIBILITY: The Vice Principal HR & Student Services is responsible for this policy. The Director Student Services is responsible for the monitoring of the policy.

LEGAL CONTEXT: Keeping Children Safe in Education Statutory Guidance for Schools and Colleges (2026); Working Together to Safeguard Children (2026); Children Act 2004; The Prevent Duty (2015); The Human Rights Act 1998 (HRA); Equality Act 2010

Table of Contents

PART A: POLICY STATEMENT & PRINCIPLES 5

1. Policy Statement 5
2. Aims 6
3. Definitions 6
4. Legal Framework 7
5. Supporting Young people and adults at risk 7
6. Safeguarding in Tutorial and in the Curriculum 8
7. Children/ Young People who are Looked After 8
8. Young People in Kinship Care 9
9. Safeguarding and Internet Safety 9

PART B: SAFEGUARDING ROLES & RESPONSIBILITIES 10

1. Governing Body 10
2. Staff Roles and Responsibilities 10
   The role of the Designated Safeguarding Lead 10
   All staff members, governors, volunteers and external providers 12
3. Staff Induction, Training and Development 13

PART C: IMPORTANT INFORMATION 15

1. Young People Suffering or likely to Suffer Significant Harm 15
2. Definitions of Abuse 15
3. Young people who need a Social Worker 16
4. The Impact of Abuse, Neglect and Exploitation 17
5. Recognising Signs of Child Abuse 17
6. Early Help / Family Help 18
7. Specific Safeguarding Issues 18
   Child on child Abuse 18*
   Sexual violence and sexual harassment 20
   Child Criminal Exploitation (CCE) 20
   Child Sexual Exploitation (CSE) 21
   Serious violence 21
   Mental Health 21
   Young People Who Are LGBT+ 22
   Young People Who Are Questioning Their Gender 22
   Contextual Safeguarding 24
   Protection from Extremism and Radicalisation 24
   Online Safety 25
   Cybercrime 26
   Online Teaching 26
   Domestic Abuse 27
   Violence Against Women and Girls (VAWG) 28
   Other Safeguarding Issues 29

PART D: SAFEGUARDING PROCEDURES 30

1. Triage Process 30
2. Dealing with Disclosures and concerns: 30
3. Reporting 31
   MyConcern 31
   Safeguarding Leads contact details 31
4. Students who go missing from Education 31
5. Safeguarding and Forced Marriages 32
   First steps in all cases 32
   What to Do When a Student Is Going Overseas Imminently 33
6. Female Genital Mutilation 34

7. EXPLOITATION 34
8. CHILD ON CHILD ABUSE 34
Responding to incidents of bullying / child on child abuse *34*
Safeguarding and supporting the victim *35*
Safeguarding and supporting the alleged perpetrator *35*
Monitoring *36*
9. SEXUAL VIOLENCE AND SEXUAL HARASSMENT 36
Responding to reports of sexual violence and sexual harassment from students *36*
Risk Assessment *37*
Action following a report of sexual violence and/or sexual harassment *37*
Options to manage the report *38*
The end of the criminal process *39*
Ongoing response Safeguarding and supporting the victim *39*
Safeguarding and supporting the alleged perpetrator *40*
10. SHARING NUDES AND SEMI-NUDES: HOW TO RESPOND TO AN INCIDENT 40
What do we mean by sharing nudes and semi-nudes? *40*
What to do if an incident comes to your attention *40*
11. PRIVATE FOSTERING 41
12. PHYSICAL CONTACT WITH STUDENTS/RESTRAINT 41
Who can use reasonable force? *42*
Using Force *42*
When can reasonable force be used? *42*
13. INCIDENTS INVOLVING CHILDREN WITH SEN OR DISABILITIES 43
14. POWER TO SEARCH STUDENTS WITHOUT CONSENT 43
15. SAFEGUARDING AND WORK PLACEMENTS 43
Long Term Placements *43*
Short Term Placements *44*
16. SERVICES OR ACTIVITIES PROVIDED BY ANOTHER BODY ON COLLEGE PREMISES 44
17. CONFIDENTIALITY AND INFORMATION SHARING 44
18. STUDENTS CONSENT TO THE REFERRAL 45
19. RECORD KEEPING 45
20. SUPERVISION OF CHILD PROTECTION WORK 45
21. PROFESSIONAL DISAGREEMENT PROCEDURES (DISPUTE RESOLUTION) 46
22. TRANSFER 46
23. RETENTION 46

PART E: REPORTING AND DEALING WITH ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF 48

1. INTRODUCTION 48
2. RECEIVING AN ALLEGATION FROM A YOUNG PERSON OR VULNERABLE ADULT 48
3. INITIAL ASSESSMENT AND THE ROLE OF CASE MANAGER 49
The 'harms threshold' *49*
4. LOW LEVEL CONCERNS 49
Responding to low-level concerns *50*
5. ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD 50
Initial response *50*
Looking after the welfare of the young person/vulnerable adult *50*
Investigating and supporting the person subject to the allegation *51*
Internal Investigations *51*
Potential outcomes *52*
Following a criminal investigation or a prosecution *52*
Unsubstantiated, unfounded, false or malicious allegations *52*
The Disciplinary Investigation *53*
6. SUSPENSION OF STAFF 53
7. RECORDS 55
8. MONITORING EFFECTIVENESS 55

PART F: SAFER RECRUITMENT 56

1. INTRODUCTION 56
2. RECRUITMENT AND SELECTION PROCEDURES 56
Advert *56*

Application Forms *56*
Shortlisting *57*
Employment History and References *57*
Selection *58*
Pre-appointment vetting checks, regulated activity and Recording Information *58*
3. POLICY AND PROCEDURE FOR DBS AND THE BARRED LISTS CHECKS AND REGISTRATION 58
Introduction *58*
General Principles *58*
Roles and Responsibilities *59*
Reporting and Review *60*
Procedures *60*
Criminal Convictions *62*
Recording Information *62*

PART G: IMPORTANT CONTACTS 64

Solihull MBC Contacts *64*
Birmingham Contacts *64*
Coventry Contacts *64*
Warwickshire Contacts *64*
Worcestershire Contacts *64*

PART A: POLICY STATEMENT & PRINCIPLES

1. Policy Statement

Solihull College & University Centre and Stratford upon Avon College (hereafter referred to as the College) recognise their moral and statutory responsibility to safeguard and promote the welfare of all young people and adults at risk. Throughout the policy and procedures, reference is made to 'young people'. This term is used to mean those under the age of 18. The Corporation recognises that some adults may also be vulnerable to abuse, and, accordingly, the procedures may be applied to allegations of abuse and protection of adults at risk. All young people and adults at risk regardless of age, gender, race, ability, sexuality, religion, culture or language have a right to be protected from harm.

The governing body will ensure that the College will safeguard and promote the welfare of students and work together with other agencies to ensure that the College has adequate arrangements to identify, assess and support those young people and adults at risk who have been harmed or are at significant risk of being harmed.

- This policy sets out how the governing body of the Corporation is carrying out its statutory responsibility to safeguard and promote the welfare of young people and adults at risk in accordance with Section 175 of the Education Act 2002.

- This policy applies to all staff (teaching and non-teaching), governors, volunteers, contractors, temporary and supply staff working at the College.

- This policy will be reviewed annually by the governing body and is in line with the requirements of Working Together to Safeguard Children (DfE, August 2026), Keeping Children Safe in Education (DfE, September 2026)

- This policy is made available to parents/guardians on request and published on the College's website (https://www.solihull.ac.uk/about-us/safeguarding-prevent/), so that parents/guardians have an understanding of the safeguarding responsibility placed on the College.

The welfare of our students is our paramount concern. Our college is a community and we all (staff, governors, parents, families and students) have an essential role to play in making it safe and secure. This includes maintaining an attitude of "it could happen here" where safeguarding is concerned.

Safeguarding and promoting the welfare of young people and adults at risk is everyone's responsibility. Everyone who comes into contact with young people or adults at risk and their families has a role to play in safeguarding young people and adults at risk.

We make every effort to provide a safe and welcoming environment, underpinned by a culture of openness where both young people and adults feel secure, able to talk, believe they are being listened to and know their concerns will be treated seriously.

Where there is a safeguarding concern the college will ensure that the young person's wishes and feelings are taken into account and that the response will be young person centred when determining what action to take and what services should be provided.

2. Aims

The Corporation is committed to ensuring that the College:

i. Provides a safe environment for young people and adults at risk;
ii. Identifies young people and adults at risk who are suffering, or likely to suffer, significant harm; and
iii. Takes appropriate action to see that such young people and adults at risk are kept safe, both at home and at the College.

In pursuit of these objectives, the Corporation will review these policy and procedures annually with the aim:

- To set clear expectations of how we expect all staff and volunteers to respond in the event of a concern about a young person or vulnerable adult, including their responsibilities in identifying and reporting possible cases of abuse, in order to safeguard young people and adults at risk.

- To identify key roles and responsibilities for all staff in relation to safeguarding, and emphasise the need for good levels of communication between all members of staff in college.

- To recognise our responsibility to refer any significant concerns about a child or young person which may indicate physical abuse, emotional abuse, sexual abuse (including child sexual exploitation) or neglect to the relevant Multi-agency Safeguarding Hub (MASH). Local Safeguarding Children's Partnerships Thresholds criteria will be used to support decision making in any referral.

- To provide reports to and attend any statutory child protection conferences, initial and review, core group meetings and child in need conferences that may be called in line with relevant Local Safeguarding Partnerships.

- To engage in child protection statutory assessment and interventions as required, recognising our duty to work with other agencies in protecting children from harm (e.g. Children's Social Work Services, Police Public Protection Unit, health professionals including mental health professionals).

- To maintain clear management oversight of all safeguarding work; identifying, referring and supporting young people and adults at risk known to be at risk of harm, ensuring students at risk of harm are safeguarded and receive timely support and intervention; including early help /family help and prevention work.

3. Definitions

Safeguarding and promoting the welfare of children/young people: Providing help and support to meet the needs of children/young people as soon as problems emerge. Protecting children/young people from maltreatment, whether that is within or outside the home, including online. Preventing the impairment of children's/young person's mental and physical health or development. Ensuring that children/young people 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.

Child Protection: is an aspect of safeguarding, but is focused on how we respond to children or young people who have been significantly harmed or are at risk of significant harm.

Young People: refers to all students who have not yet reached their 18th birthday. It will extend to visiting young people and students from other establishments.

Parent: refers to birth parents and other adults in a parenting role, for example adoptive parents, step parents and foster parents. This can also include those kinship carers (e.g. grandparents, extended family, or family friends with informal care arrangements)

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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. In the Children's Acts 1989 and 2004, **a child** is anyone who has not yet reached their eighteenth birthday.

4. Legal Framework

The Children Act 1989 and 2004 introduced the concept of significant harm as the threshold which justifies compulsory intervention in family life in the best interests of children Under Section 17 (10) of the Children Act 1989, a child is in "need" if:

- He/she is unlikely to achieve or maintain, or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him/her of services by a local authority;
- His/her health or development is likely to be significantly impaired, or further impaired, without the provision for him/her of such services; or
- He/she is disabled.

The following legislation and guidance is relevant to this policy and set of procedures:

- The Sexual Offences Act 2003
- The Counter-Terrorism and Security Act (2015), section 26 The Prevent Duty
- Serious Crime Act (2015), Mandatory reporting duty for known cases of female genital mutilation.
- Statutory Guidance: Keeping Children Safe In Education (September 2026)
- Statutory Guidance: Working Together to Safeguard Children (August 2026)
- Statutory Guidance: Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE March 2024).
- What to do if you're worried a child is being abused (March 2015)

5. Supporting Young people and adults at risk

We recognise that a young person or vulnerable adult who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the college may provide the only stability in the lives of young people and adults at risk who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a young person or vulnerable adult in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

We support all young people and adults at risk by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.

- Ensuring repeated hate incidents, e.g. racist, homophobic or gender or disability-based bullying, are considered under safeguarding procedures.
- Promoting a caring, safe and positive environment within the college, with access to appropriate adults to approach if they are in difficulties.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children, including notifying social care as soon as there is a significant concern.
- Notify the allocated social worker of any new concerns about a young person or vulnerable adult who is subject to a child protection plan or a child in need plan
- Monitoring young people and adults at risk who have been identified as having welfare of protection concerns and providing appropriate support. An individual support plan is devised, implemented and reviewed regularly for pupils requiring early help/family help of safeguarding. This is kept with the safeguarding record.
- Where young people and adults at risk have exhibited sexually inappropriate/ harmful behaviour and/or exhibited sexually inappropriate/harmful behaviour towards others. Where necessary a co-ordinated multi-agency response is undertaken to ensure the appropriate safeguards and support are in place. We ensure that the needs of young people and adults at risk who abuse others will be considered separately from the needs of their victims.
- Providing continuing support to a young person or vulnerable adult about whom there have been concerns who leaves the college by ensuring that appropriate information is copied under confidential cover to the young person's new setting.

6. Safeguarding in Tutorial and in the Curriculum

As a College we will educate and encourage students to keep safe through the provision of curriculum opportunities which include safeguarding. Tutorial for full-time 16 -18-year-old students, referred to at the College as personal & professional development (PPD) and aspects of the curriculum (for example, personal, social and health and economic education, PSHE) include an emphasis on relationships (healthy relationships and sex education), building confidence critical thinking skills and resilience in students, developing preventative strategies to ensure their own protection and that of others whilst promoting fundamental British Values.

Opportunities are provided for students to develop the knowledge, skills and strategies they need to stay safe from abuse. For example: assessing risk, positive self-esteem, emotional literacy, assertiveness, and understanding of healthy relationships, sex and relationships education (including consent, CSE and sexual harassment), online safety, preventing radicalisation, female genital mutilation, and anti-bullying. Clear advice and guidance is built into the curriculum to ensure that students understand who they can turn to for advice and support and that they know where and how to report abuse.

7. Children/ Young People who are Looked After

The most common reason for children/young people becoming looked after by the local authority is as a result of abuse and/or neglect. We ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe. We ensure that:

- Appropriate staff have the information they need in relation to a young person's looked after legal status (this includes whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility.
- Appropriate staff have information about the young person's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.
- The DSL, designated safeguarding lead, and the Caring Services Manager have the details of the child's social worker and the name of the virtual school head in the authority that looks after the young person.

The Children In Care Coordinator, who is the designated member of staff for looked after children, is responsible for ensuring a Personal Education Plan (PEP) is in place for each

looked after young person in the College and is responsible for liaising with the home local authority virtual school for looked after children to ensure the highest expectations around educational attainment. The Children In Care Coordinator will work in partnership with the designated safeguarding lead and the social work team of the home local authority around any safeguarding concerns and placement stability issues. The Children In Care Coordinator receives appropriate training to undertake the role effectively.

8. Young People in Kinship Care

Some young people may be living in kinship care arrangements. Kinship care refers to situations where a child is being raised by a relative, friend or connected person who has stepped into a parental role because their parents are unable to care for them.

Young people in kinship care may have experienced significant adversity, trauma, family disruption, bereavement, parental illness, parental imprisonment, neglect, abuse or other circumstances that have led to changes in their living arrangements. As a result, some young people in kinship care may be particularly vulnerable and may require additional pastoral, safeguarding and educational support.

Young people living in kinship care are not necessarily looked after by the Local Authority and may therefore not automatically receive the additional support available to children in care. Staff should remain alert to the potential needs and vulnerabilities of young people in kinship care and ensure that appropriate support is considered where required.

The Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and relevant staff will work together to ensure that young people identified in kinship care receive appropriate support and that any safeguarding concerns are responded to promptly and effectively. Where appropriate, this may include Early Help, Family Help, multi-agency working or referral to Children's Social Care.

Staff should be aware that information about a student's living arrangements may help identify safeguarding needs and should therefore be shared with the Safeguarding Team through normal safeguarding procedures where there are concerns about a student's welfare, wellbeing or safety.

9. Safeguarding and Internet Safety

This section must be read in conjunction with the College's Computer Acceptable Use Policy and the E Communication policy. The Computer Acceptable Use Policy, issued to students during induction and accessible online, advises on safe use of the internet including the protection of personal information and guidance on personal safety. It defines, in detail, the College etiquette for computer use. The E Communication Policies provides guidelines for staff and students advising on the appropriate use of social media and acceptable contact. The College blocks access to websites considered inappropriate for students to access, including some social networking sites. The College recognises that these sites are accessed by students outside of College and at times are used inappropriately. The College monitors use of these sites regularly and when specific concerns are raised, regardless of known incident, and requests removal of any unacceptable material that references the College. Induction tutorials brief students in being safe online. Staff inductions brief staff on the colleges internet filter systems and procedures.

PART B: SAFEGUARDING ROLES & RESPONSIBILITIES

1. Governing Body

The Governing body is collectively responsible for ensuring that child protection arrangements are fully embedded within the college's ethos and adhered to in the college's day-to-day practice, specifically:

- Ensuring there is a nominated safeguarding governor who ensures accountability for safeguarding and attends appropriate training in order to guide governors on their strategic responsibilities. The nominated safeguarding Governor is Mehreen Mirza. She is responsible for safeguarding and championing good practice; to liaise with the DSL and to provide support and challenge in the area of safeguarding.
- Liaising with the Principal/designated staff over all matters regarding safeguarding issues. This is a strategic role rather than operational – governors will not be involved in concerns about individual students. The safeguarding governor should provide appropriate challenge and support for any action to progress areas of weakness or development in the education provision's safeguarding arrangements.
- Ensuring a member of the senior leadership team is appointed as the Designated Safeguarding Lead (DSL) who leads on and has clear oversight of all safeguarding work. The DSL must be appropriately trained to undertake this role. Governors must support the DSL in their role by ensuring the allocation of funding and resource is sufficient to meet the current safeguarding activity.
- Ensuring the DSL produces an annual report to the governing body of safeguarding activity, outlining the number of cases dealt with and other statistics which do not identify individuals.
- Ensuring the education provision fully engages with the local authority in their annual review of safeguarding procedures, providing relevant information in a timely manner. The chair of governors should sign to confirm accuracy of the education provision's arrangements, and ensure any concerns are remedied without delay.
- Ensuring **all** Governors receive appropriate safeguarding and child protection (including online) training at induction and updated at regular intervals.
- Ensuring the college has an effective child protection policy, staff behaviour policy and student behaviour policy.
- Ensuring that all college staff and volunteers (including governors) receive safeguarding awareness training at the required frequency.
- Ensuring the college has a broad and balanced curriculum that teaches young people and adults at risk about keeping safe.
- Ensuring that online safety is a central theme in the colleges approach to safeguarding.
- Ensuring that Keeping Children Safe in Education, DfE, 2026 and Working Together to Safeguard Children, DfE, 2026) and local requirements (specifically Solihull and Warwickshire Local Partnerships procedures and Solihull and Warwickshire local authority policy, advice and guidance) are adhered to.

2. Staff Roles and Responsibilities

<u>The role of the Designated Safeguarding Lead</u>

The **Designated Safeguarding Lead (DSL)** is Adam Thomas and is a member of the Senior Leadership Team. His job description clearly reflects this role. He has undertaken relevant training to the role and receives at least bi-annual updates.

The **Safeguarding Panel** comprises the DSL and Vice Principal HR and Student Services and is responsible for decision making on suitability of adults working with young people and adults at

risk, for instance as part of the safer recruitment process (Part F) and in advising on managing allegations against staff (Part E).

The Deputy Designated Safeguarding Leads (DSL) are Pete Haynes, Kully Dhaliwal and Peter Stone. Their job descriptions clearly reflect this role. They have undertaken relevant training to undertake the role and receive(s) at least bi-annual updates.

In addition, the College has Safeguarding Officers, who undertake relevant training to the role and receive at least bi-annual updates.

The College Safeguarding Team comprises the Designated Safeguarding Lead (DSL), Deputy DSLs and the College's Safeguarding Officers.

In the absence of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead the most senior member of staff in education provision will assume responsibility for any safeguarding matters that arise.

Where the DSL is referred to in these procedures, this role may be undertaken by the Deputy DSLs.

The DSL will assess the information provided, using the relevant multi-agency thresholds criteria and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm or risk of significant harm has been reached; or they are not clear if the threshold is met, then the DSL will contact children's social care.

The DSL will make a professional judgement about what action needs to be taken, using Guidance Threshold Criteria to help support Children, Young People and their Families, the college child protection procedure (ie this document) and Children's Safeguarding Partnerships procedures. The DSL will consider the following:

- the nature of the concern;
- how and why it has arisen;
- what the presenting child's and family's needs appear to be;
- what relevant information is held by the college, (consider any previous referrals, closed case to children's social work, any other concerns; early help/family help work, developmental needs of the young person, parenting capacity, family structure)
- whether the concern indicates a likelihood of **Significant Harm** and if so;
- whether there is any need for any urgent action to protect the young person or vulnerable adult, any other young people or adults at risk in the same household or any young person or vulnerable adult in contact with an alleged perpetrator;
- whether there are any other young people or adults at risk, either in the household or in contact with any alleged perpetrator of abuse, identified as in need or at risk of harm;
- whether the young person or vulnerable adult has any sibling(s) at other education provisions or early years settings and consider whether information is such that it should be shared with that other setting;
- whether there are any concerns regarding an abuse of a position of trust;
- where targeted support services have been offered but there is refusal or reluctance by the parent/carer to engage or engage consistently with the support being offered and therefore the identified cause of concern/need is not being addressed, i.e. no improved outcome for the young person or vulnerable adult;
- where targeted support services have been in place but the parent or carer appear unable to make the required changes in order to improve outcomes for the young person or vulnerable adult.

Where a DSL makes a referral, they should include:

- the known facts;
- any suspicions or allegations;
- whether or not there has been any contact with the young person or adults at risk family;
- any information they have on the young person or adults at risk developmental needs, and the capacity of the young person or adults at risk parent or carers to meet those needs.

If the DSL feels unsure about whether a referral is necessary, a telephone call to MASH can be made for advice.

If the young person or vulnerable adult is in immediate danger and urgent protective action is required, the police should be called. The DSL should also notify Children's Social Care of the occurrence and what action has been taken. This should be formally recorded by the College.

Where the student is suffering from a serious injury, medical attention must be sought immediately by calling an ambulance or taking the student to the Accident and Emergency Department of the local hospital. The DSL should notify Children's Social Care. On arrival at the hospital, the duty consultant paediatrician must be informed of the nature of the concerns. The DSL should make a referral and ensure that all events, advice, notifications and actions are recorded, including any decision making. The DSL should seek advice from Children's Social Care about informing parents, remembering that parents should normally be informed that a young person or vulnerable adult requires urgent medical attention.

In accordance with the Local Safeguarding Partnership procedures, the agreement of the parents for a referral to MASH should normally be sought where possible, However, if it is felt that seeking any such agreement would increase the level of significant risk to the young person or vulnerable adult, the matter should be discussed with MASH and their advice sought. This must not contribute to a delay in making a referral.

The DSL/DDSLs will work with curriculum and pastoral leaders to promote attendance, retention, achievement and progression for students who have or have had social worker involvement.

The Principal will ensure that the safeguarding policies and procedures adopted by the governing body are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.

All staff members, governors, volunteers and external providers are expected to:

- Be aware of the systems and procedures within the college which support safeguarding ie:
    - Safeguarding Young People and Adults at risk policy
    - Student Code of Conduct
    - Staff and Governor Code of Ethics and Conduct
    - Role of the designated safeguarding lead
- Undertake induction and training on safeguarding as required.
- Maintain an attitude of 'it could happen here'.
- Be alert to signs and recognise indicators of possible abuse.
- Act on any concerns about a young person's or vulnerable adult's welfare immediately. Remember that the young person's views, welfare and interests must be the paramount consideration at all times.
- Never promise to keep a secret or confidentiality, where a young person or vulnerable adult discloses abuse.
- Know the definitions for abuse and the impact abuse can have on children and young people.
- Be alert to signs and recognise indicators of possible abuse.
- Listen to abuse concerns shared by a young person or vulnerable adult (disclosure) and follow college safeguarding procedures, including notifying the DSL immediately.
- Undertake induction and training on safeguarding as required.

- Notify the safeguarding team of any unexplained absence of a young person on a Child Protection Plan or subject to a Child In Need Plan.
- Report to the safeguarding team any additional concerns, disclosures or observations after the initial referral, not assuming that a referral in itself will protect young people or adults at risk.

Any member of staff who has concerns about the safety or potential abuse of a young person must report their concerns to the Safeguarding Team **without delay**. This includes allegations made against other young people and adults at risk.

Staff are not expected to take it upon themselves to investigate concerns or make judgements.

3. Staff Induction, Training and Development

All staff members and Governors are required to complete a mandatory programme of safeguarding training, together with mandatory online Prevent awareness training. This is currently provided through the Educare/TES online level 2 child protection programme. All new staff members will also receive familiarisation training with a member of the safeguarding team. The DSL/Deputy delivers a safeguarding awareness session around College procedures as part of the College-wide training programme.

All staff members should also receive appropriate safeguarding and child protection updates, This should include training on how to recognise signs of abuse **and** how to respond to any concerns. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Individuals **must**:

- undertake mandatory safeguarding training
- read part one of Keeping Children Safe In Education 2026 and understand its implications for their role. The College will maintain auditable records confirming completion.
- read and understand the college's safeguarding young people and adults at risk policy and make sure they are clear on how to act in the event of a concern and maintaining confidentiality;
- read and understand the student code of conduct and ensure they follow it in the course of their day to day work with young people and adults at risk;
- read and understand the Staff and Governor Code of Ethics and Conduct, so that they are clear on what to do if there is a breach of the code of conduct
- understand the difference between having a concern about a young person or vulnerable adult, and a young person or vulnerable adult in immediate danger, being clear on the relevant actions to take;
- know the role of the designated safeguarding lead in college;
- understand that early help/family help and support that can be provided by the college, and their role in early help/family help.
- be aware that young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

The DSL provides at least an annual briefing to the college to provide staff with any updates on changes to child protection legislation, procedures and relevant learning from key serious case reviews.

The college maintains accurate signed records of staff safeguarding induction, training and reading.

The nominated safeguarding governor undergoes child protection training prior to or as soon as appointment to the role and at regular intervals thereafter.

The Designated Safeguarding Lead attends the multi-agency safeguarding LSCP training within 12 weeks of taking up their responsibilities. The education provision will ensure that its Designated Safeguarding Lead (and Deputies if appropriate) attend the Designated Safeguarding Lead annual education conference to keep abreast of child protection learning and developments, at least biannually.

The Safeguarding Officers attend the safeguarding Early Help/Family help LSCP training within 12 weeks of taking up their responsibilities. The Safeguarding Officers also attend other LSCP training courses at least annually.

The College will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contracted staff, such as catering staff, are aware of our safeguarding young people and adults at risk policy and procedure, and have received appropriate safeguarding training.

PART C: IMPORTANT INFORMATION

1. Young People Suffering or likely to Suffer Significant Harm

The Children Act 1989 introduced the concept of **significant harm** as the threshold that justifies compulsory intervention in family life in the best interests of a child. It gives local authorities a duty to make enquiries under section 47 of the Children Act 1989 to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm. Such enquiries must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation and other so-called honour based violence, extra-familial threats like radicalisation, child criminal exploitation including sexual exploitation and sexual violence.

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (2026) as:

- protecting children from maltreatment;
- preventing impairment of a child's health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes. (DfE, August 2018 p7)

All staff should be aware that young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a young person.

2. Definitions of Abuse

All college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Physical Abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person or vulnerable adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a young person or vulnerable adult.

Emotional Abuse is the persistent emotional maltreatment of a young person or vulnerable adult such as to cause severe and persistent adverse effects on the young person or adults at risk emotional development. It may involve conveying to young people or adults at risk 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 young person or vulnerable adult 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 young people or adults at risk. These may include interactions that are beyond the young persons or adults at risk developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person or vulnerable adult participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing young people or adults at risk frequently to feel frightened or in danger, or the exploitation or corruption of young people or

adults at risk. Some level of emotional abuse is involved in all types of maltreatment of a young person or vulnerable adult, though it may occur alone.

Sexual Abuse involves forcing or enticing a young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person or vulnerable adult 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 young person or vulnerable adult in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people or adults at risk.

Neglect is the persistent failure to meet a young person or adults at risk basic physical and/or psychological needs, likely to result in the serious impairment of the young person or adults at risk health and development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a young person or vulnerable adult 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 young person or vulnerable adult from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-takers);
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a young person or adults at risk basic emotional needs.

Additional Vulnerabilities for Pupils with Special Educational Needs and Disabilities (SEND)

Additional barriers can exist when recognising abuse and neglect for young people and adults at risk with special educational needs and disabilities, including:

- assumptions that indicators of possible abuse (eg: behaviour, mood, injury) relate to the young person's or adults at risk disability without further exploration;
- Young people and adults at risk with SEND can be disproportionally impacted by things such as bullying – without outwardly presenting any signs;

communication barriers and difficulties (eg: not hearing, not listening, not seeing) in overcoming these.

3. Young people who need a Social Worker

Young people may need a social worker due to safeguarding or welfare needs. Young people may need this help due to abuse, neglect and complex family circumstances. A young person's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

We will work with Local authorities who should share the fact a young person has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the young person's safety, welfare and educational outcomes.

Where young people need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

4. The Impact of Abuse, Neglect and Exploitation

The sustained abuse, neglect or exploitation of young people and adults at risk physically, emotionally, or sexually can have long-term effects on the young person's or adults at risk health, development and well-being. It can impact significantly on a young person's or adults at risk self-esteem, self-image and on their perception of self and of others. The effects can also extend into adult life and lead to difficulties in forming and sustaining positive and close relationships. In some situations it can affect parenting ability.

5. Recognising Signs of Child Abuse

The following signs may indicate something is wrong:

- significant change in behaviour
- extreme anger or sadness
- aggressive and attention seeking behaviour
- suspicious bruises with unsatisfactory explanations
- lack of self esteem
- self-injury or harm
- depression
- age inappropriate sexual behaviour

(For further guidance, "What to do if you are worried a child is being abused?" https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2).

If abuse is suspected, presence of signs of abuse is not proof that the abuse has occurred, but:

- must be regarded as indicators of the possibility of significant harm
- justify the need for careful assessment and discussion with the designated member of staff for safeguarding / decision making conversation which is logged
- may require consultation with and / or referral to Children's Social Work Service

The absence of such risk indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the young person or vulnerable adult may:

- appear frightened of the parents
- act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- persistently avoid young persons or adults at risk health promotion services and treatment of the young persons or adults at risk episodes of illness
- have unrealistic expectations of the young person
- frequently complain about/to the young person and may fail to provide attention or praise (high criticism/low warmth environment)
- be absent or misusing substances
- persistently refuse to allow access to professionals on home visits
- be involved in domestic abuse

Staff should be aware of the potential risk to young people and adults at risk when individuals, previously known or suspected to have abused young people or adults at risk, move into the household.

6. Early Help / Family Help

Early help/Family help means providing support as soon as a problem emerges at any point in a young person's life. If early help/family help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help/family help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the young person's situation does not appear to be improving or is getting worse.

Any child/young person may benefit from early help/family help, but all college staff should be particularly alert to the potential need for early help/family help for a child/young person 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 showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

7. Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put young people or adults at risk at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that young people are at risk. Below are some safeguarding issues all staff should be aware of.

<u>Child on child Abuse*</u>

**In line with the change to the definition in KCSiE, the College refers to the term child rather than young person in this heading. This College-specific guidance, however, refers to young people.*

The college operates a zero-tolerance approach to bullying and child on child abuse.

The College uses opportunities for promoting anti-bullying messages and the College's zero-tolerance approach to handling bullying issues through a variety of methods:

- PPD sessions

- The Student Handbook
- Student workshops
- College awareness events
- Promoting national events
- Through Student Voice

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). It is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. It can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

Young people are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Staff should not dismiss abusive behaviour as normal between young people and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Particular difficulties arise in responding to a young person who abuses another young person because:

- There is no clear boundary between incidents which should be regarded as abusive and incidents which are dealt with as bullying, sexual experimentation etc. Many adults who abuse children repeatedly established this pattern of behaviour in childhood or adolescence, but a single incident of abuse does not indicate that a young person is likely to abuse again; and
- Some young people who abuse have themselves been abused, but this cannot be assumed in any particular case

The needs of the victim and the needs of the alleged perpetrator must be considered separately. In addition to safeguarding the identified victim, consideration will be taken to whether the alleged perpetrator seems to pose a risk to any other young person or vulnerable adult. Young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes. The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other young people.

If one young person causes harm to another, this should not necessarily be dealt with under these procedures. However, if may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (eg age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other young people; or
- There are concerns about the intention of the alleged perpetrator.

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This 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 which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence and sexual harassment.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) – please refer to section D for further guidance on responding to an incident of nudes and semi-nudes being shared;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- upskirting (which is a criminal offence), 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.

All staff should understand, that even if there are no reports in 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 child on child abuse they **should refer to the procedures Part D section 2 and section 8 for dealing with disclosures of child on child abuse.**

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and gender from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of Keeping children safe in education (KCSIE), all staff working with children are advised to maintain an attitude of 'it could happen here'.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
Young people who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college. As set out in Part One of KCSIE, staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships.

Staff should refer to Part D Section 2 and Section 9 for dealing with disclosures of child on child sexual violence and sexual harassment.

Child Criminal Exploitation (CCE)

CCE is a form 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 criminal activity.

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

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

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

Child Sexual Exploitation (CSE)

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 activity.

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 nonpenetrative 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.

Staff should refer to Part D Section 2 and Section 7 for dealing with disclosures or concerns around exploitation (CCE or CSE).

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 college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in 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.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from college, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Mental Health

Mental health problems can, in some cases, be an indicator that a young person 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. Staff however, are well placed to observe young people 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 young people 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.

If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken, following the procedures set out in Part D Section 2 for Dealing with Disclosures or Concerns

Young People Who Are LGBT+

The College recognises that being LGBT+ is not, in itself, a safeguarding issue.

However, some young people who are part of the LGBT+ community may experience bullying, harassment, discrimination, social isolation, abuse or prejudice, both online and offline. These experiences can have a significant impact on a young person's wellbeing, mental health, attendance, engagement and educational outcomes.

The College is committed to providing a safe, inclusive and respectful environment where all students are treated with dignity and respect. The College operates a zero-tolerance approach to bullying, harassment, discrimination and hate-related incidents on the grounds of sexual orientation.

Staff should remain alert to any safeguarding concerns which may arise as a result of bullying, discrimination, family rejection, exploitation, mental health difficulties, self-harm or other vulnerabilities that may affect some LGBT+ young people.

Any concerns regarding a student's welfare, wellbeing or safety should be reported through the College safeguarding procedures.

Young People Who Are Questioning Their Gender

The College recognises that some young people may question their gender and may seek support from staff during this process. The College is committed to ensuring that all students are treated with dignity, respect and compassion and that their welfare remains paramount in all decision-making.

A student may choose to discuss feelings relating to their gender identity with a member of staff without seeking any change to how they are treated by the College. Such conversations will be managed sensitively. The fact that a student is questioning their gender does not, in itself, constitute a safeguarding concern.

The College acknowledges that young people who are questioning their gender may experience additional vulnerabilities, including anxiety, emotional distress, social isolation, bullying, discrimination, self-harm, suicidal ideation and mental health difficulties. Staff should remain alert to these risks and report any safeguarding concerns in accordance with this policy.

The College recognises that issues relating to gender questioning may engage safeguarding considerations and that decisions affecting a student's welfare should be assessed through appropriate student support processes, recognising that decisions may have implications for the welfare, wellbeing and safety of the individual student and others.
The following principles will apply:

- The welfare of the young person will be the primary consideration.
- Decisions will be made on an individual basis, with the student's wishes and feelings given appropriate weight, but with decisions ultimately guided by an assessment of the student's welfare, safeguarding needs and best interests.
- The wishes, feelings, age, maturity, understanding and individual circumstances of the student will be considered.

- Any decisions made will take account of safeguarding, wellbeing, educational, legal and equality considerations.
- The College will maintain accurate and appropriate records of all decisions, actions and reviews.
- The Designated Safeguarding Lead (DSL) or Deputy DSL must be involved in any significant decision-making process.

Requests Relating to Social Transition

Where a request relating to social transition is raised by a student, parent or carer, the College will undertake a structured and individual assessment led by the DSL or Deputy DSL in consultation with other relevant professionals where appropriate.
For the purposes of this policy, social transition may include, but is not limited to:

- requests to use a different name;
- requests to use different pronouns;
- changes to appearance or presentation whilst attending College;
- access to toilets, changing facilities or residential accommodation;
- participation in sport, trips or enrichment activities;
- requests relating to student records or communications

Parental Involvement

For students under the age of 18, parents or carers will normally be involved in discussions and decision-making as early as possible.

The College recognises that parents have an important role in supporting the welfare of their child.

Where a student asks the College not to inform their parent or carer, the DSL or Deputy DSL will undertake a safeguarding assessment to determine whether involving parents would place the student at risk of suffering harm.

Only where there is evidence that parental involvement may present a safeguarding risk will alternative arrangements be considered. The rationale for such decisions must be clearly recorded.

Risk Assessment and Decision Making

The DSL or Deputy DSL will ensure that a proportionate risk assessment is completed whenever significant decisions are required.

The risk assessment may consider:

- the student's wishes and feelings;
- age, maturity and understanding;
- mental health and emotional wellbeing;
- vulnerability to abuse, bullying, exploitation or discrimination;
- educational impact;
- information provided by parents or carers;
- advice from health, social care or other professionals;
- the potential impact on other students;
- health and safety considerations;
- legal duties and responsibilities.

Single-Sex Facilities and Activities

The College will comply with legal requirements relating to the provision of single-sex facilities and activities.

Where a student expresses concerns regarding the use of facilities, the College will consider appropriate arrangements which support the welfare, dignity, privacy and safety of all students.

Any arrangements will be considered on a case-by-case basis and recorded as part of the safeguarding assessment and decision-making process

Record Keeping and Confidentiality

Information relating to a student who is questioning their gender will be managed sensitively and shared only on a need-to-know basis.
The College will maintain safeguarding records, assessments, decisions and rationale in accordance with its safeguarding procedures and applicable data protection requirements.

Staff must not make unilateral decisions regarding social transition, confidentiality, names, pronouns, facilities or parental involvement without consultation with the DSL or Deputy DSL.

Any concerns must be referred through the College safeguarding procedures.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between young people and adults at risk outside the college. All staff, especially the designated safeguarding lead should be considering the contest within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of young people and adults at risk should consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare.

Protection from Extremism and Radicalisation

The WRAP 3 workshops that had been developed by the Home Office have been replaced nationally by an on-line Prevent programme, which all staff are required to complete. The College works closely with Prevent Officers from the West Midlands Counter Terrorism Unit to ensure that:

- College staff are adequately trained to recognise and refer concerns with regard to student radicalisation using normal safeguarding procedures
- Managers are trained in incident management
- Staff and students are trained in Stay Safe
- Learners are able to discuss radicalisation and extremism in a safe environment and know who to refer to if they have concerns

The Vice Principal HR & Student Services (Deputy DSL) is a member of the local Prevent Partnership Group and attends the Prevent Protect and Prepare partnership meetings.

This should be read in conjunction with the College's Policy to Prevent Radicalisation and Violent Extremism.

Online Safety

Technology is an integral part of the lives of young people today. The internet and other digital and information technologies are powerful tools, which open new opportunities for everyone both socially and educationally. Young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, TickTock, Snapchat and Instagram.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through child criminal and sexual exploitation; county lines activity; radicalisation; sexual predation and cyber bullying.

An effective whole college approach to online safety protects and educates students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, disinformation, conspiracy theories, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

In College we recognise this and encourage our students to use digital resources both in College and at home responsibly. The College have e-communications policies for both staff and students. Students are informed of the policy and how to access it as part of their induction.

The College recognises that AI technologies may be used to create or manipulate sexualised or harmful imagery involving children and young people. Such incidents will be treated as safeguarding concerns and managed through safeguarding procedures. The College also recognises the importance of equipping staff and students with the knowledge and skills to use emerging technologies safely and responsibly. The College will ensure that filtering and monitoring systems are regularly reviewed, and that staff are aware of the risks associated with AI-generated content, including misinformation, disinformation, and data privacy concerns. Cyber security awareness will be embedded into staff training and student curriculum to promote safe digital practices and protect personal and institutional data.

Throughout our PPD and curriculum programmes students cover different aspects of staying safe online and using technologies responsibly. Topics covered include protecting your online

identity, radicalisation and fake news, the law relating to the sending and receiving of inappropriate images and the dangers of internet grooming.

The creation, downloading, distribution and copying of pornographic images of children are child abuse and are criminal offences. They are classed as gross misconduct and will lead to instant dismissal for staff and Behaviour Support process with possible exclusion for students.
If you become aware of the creation, downloading, distribution or copying of pornographic images of children: contact the DSL immediately, or a Deputy Designated Safeguarding Lead.

Filtering and monitoring arrangements will be reviewed at least annually. The Governing Body will receive assurance regarding the effectiveness of filtering and monitoring systems.

If you are concerned about any student with regard to online safety you must follow the college procedures set out in Part D Section 2 of this guidance.

Cybercrime

Developments in technology have created opportunities for individuals to commit offences through the use of computers, networks and online services. These offences are commonly referred to as cybercrime and may include activities such as unauthorised access to computer systems, hacking, malware distribution, denial of service attacks, online fraud and other offences committed through digital technologies.

Some young people, particularly those with an interest, aptitude or advanced technical skills in computing and digital technologies, may become involved in cyber-dependent or cyber-enabled offending, either deliberately or unintentionally.

Staff should be aware that involvement in cybercrime may be linked to wider safeguarding concerns, including criminal exploitation, online harms, radicalisation, organised crime networks or vulnerabilities associated with social isolation and online communities.

Where concerns arise regarding a student's online activity or involvement in cybercrime, these should be reported through the College safeguarding procedures.

If you are concerned about any student with regard to cybercrime you must follow the college procedures set out in Part D Section 2 of this guidance.

Online Teaching

Where staff are delivering lessons online or virtually, all such lessons will be delivered in accordance with the college's safeguarding and child protection, staff behaviour (code of conduct) and acceptable use of IT policies.

Staff will always use college owned devices and accounts for the delivery of online/virtual lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used subject to data protection and retention/storage guidelines.

When delivering online/virtual lessons on a one-to-one basis or communicating with vulnerable students who are not attending college via video chat, staff will speak to parents/carers before lessons/conversations commence and when they finish before logging off.

It is important that all staff who interact with young people online continue to look out for signs that a young person may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns in the normal way.

The college will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Below are other issues that staff need to take into account when delivering online/virtual lessons or communicating with young people online, particularly where webcams are used:

- Staff and students must be fully dressed and wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example not in bedrooms; and the background should be blurred. If it is not possible to blur the background, staff must consider what young people can see in the background and whether it would be appropriate in a classroom. This includes photographs, artwork, identifying features, mirrors etc.
- Staff will ensure that resources and videos used are age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content.
- Live classes should be recorded so that if any issues were to arise, the video can be reviewed.
- Language must be professional and appropriate, including that used by any family members in the background.

Staff members delivering lessons or communicating with young people online/virtually will raise any issues in respect of inappropriate dress, setting, behaviour etc with the child and/or parent immediately and will end the online interaction if necessary.

Domestic Abuse

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 young people. In some cases, a young person may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

The Domestic Abuse Act 2021 creates a statutory definition of domestic abuse based on the existing cross-government definition.

'**Abusive behaviour**' is defined in the act as any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and 'personally connected'.

'**Personally connected**' is defined in the act as parties who:

- are married to each other
- are civil partners of each other
- have agreed to marry one another (whether or not the agreement has been terminated)
- have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- are or have been in an intimate personal relationship with each other have, or there has been a time when they each have had, a parental relationship in relation to the same child are relatives

The Act recognises children as victims of domestic abuse in their own right, statutory obligations to victims of domestic abuse are afforded to children too.

All concerns about young people being affected by domestic abuse will be reported to the Safeguarding Team as with any other safeguarding concern. The Safeguarding Team will respond to the report by consulting Children's Social Care in order to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help/family help.

The college works in partnership with West Midlands and Warwickshire Police and Children's Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass.

When the Police attend any incident of domestic violence or abuse in any household in which a student of the college lives, the Designated Safeguarding Lead will receive a confidential and secure Email on the morning of the next college day, notifying them simply that there has been an incident and that the child may need support.

The information will be managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.

Violence Against Women and Girls (VAWG)

Violence Against Women and Girls (VAWG) refers to a range of behaviours which disproportionately affect women and girls and can cause physical, sexual, psychological, emotional or economic harm. Whilst women and girls are more likely to be impacted by these forms of abuse, anyone can be affected.

Violence against women and girls can occur both within and outside of education settings, in person and online. These behaviours can include, but are not limited to:

- Sexual harassment;
- Sexual violence;
- Image-based abuse;
- Coercive or controlling behaviour;
- Stalking and harassment;
- Gender-based bullying;
- Misogynistic attitudes, language and behaviour; and
- Abuse within intimate personal relationships.

The College operates a zero-tolerance approach to all forms of sexual violence, sexual harassment, misogyny and gender-based abuse. Such behaviours will never be dismissed as banter, humour, part of growing up or accepted social behaviour.

The College recognises that harmful attitudes and beliefs can contribute to abusive behaviour and, where appropriate, will seek to educate students through Personal and Professional Development (PPD), tutorial activities and wider safeguarding education about healthy relationships, consent, respect, equality and appropriate behaviour towards others.

Staff should be aware that incidents of sexual harassment, sexual violence, misogynistic behaviour, image-based abuse or other forms of gender-based abuse may be indicators of wider safeguarding concerns. Any concerns should be reported immediately through the College safeguarding procedures outlined in Part D of this policy.

Other Safeguarding Issues

In addition to the above and the four categories of abuse, Keeping Children Safe in Education (2026) identifies the following safeguarding issues:

- Children and the court system
- Children missing from education – see Part D, Section 4
- Children with family members in prison
- County Lines Child (and vulnerable adult) criminal exploitation – see Part D, Section 7
- Trafficking and modern slavery
- Homelessness
- So-called 'honour-based' violence
- Female Genital Mutilation – see Part D, Section 6
- Forced marriage – see Part D, Section 5
- gangs and youth violence
- Upskirting
- bullying including cyber-bullying – see Part D, Section 8
- child missing from education, home or care
- drugs
- health and well-being
- fabricated or induced illness
- medical conditions
- Online safety and sharing of 'nudes' – see Part D, Section 10
- Private fostering – see Part D, Section 11
- Child abduction

If you are concerned about any student you must follow the college procedures set out in Part D Section 2 of this guidance.

PART D: SAFEGUARDING PROCEDURES

1. Triage Process

The College's pastoral teams use a triage process to foster a safe and secure environment within the College and University Centre sites, where students can study, work and develop to their full potential and receive appropriate advice and support when needed.

A referral is made to Student Services and support is provided via Student Support Officers, Learning Coaches, Mental Health Support, the College Counsellor, Disabilities Officer and the College Nurse. The TRIAGE process is designed to respond to and manage referrals and also to deal with emergency situations that may arise. The Triage process ensures that the pastoral services and the designated safeguarding lead liaise to provide oversight of any other issues the young person is experiencing and ensures that these are included in any decision making.

2. Dealing with Disclosures and concerns:

The procedure will be determined primarily by the Local Safeguarding Partnership, which establish the locally agreed inter-agency procedures. However, all staff should observe the following guidelines.

If staff have a concern about a young person or vulnerable adult, they should report these concerns to the Safeguarding Team using MyConcern – see Section 3.

If a young person or vulnerable adult tells a member of staff about possible abuse:

- Listen carefully and stay calm;
- Do not interview the person, but question normally and without pressure, in order to be sure that you understand what the person is telling you;
- Do not put words into the person's mouth;
- Reassure the person that by telling you, s/he has done the right thing;
- Inform the person that you must pass the information on, but that only those who need to know about it will be told. Inform him/her of to whom you will report the matter;
- Note the main points carefully in the person's own words; and
- Make a detailed note of the date, time, place, what the person said, did and your questions.
- Pass on this information to the safeguarding team as soon as possible.

If a young person/ vulnerable adult is freely recalling events, the response should be to listen, rather than stop him/her; questioning of the information being given must be limited to confirming factual accuracy required to provide a quality referral, e.g. who are the people involved, what has actually happened and when and where did any incident occur.

If the young person/ vulnerable adult has an injury but no explanation is volunteered, it is acceptable to enquire how the injury was sustained.

However, the young person/vulnerable adult must not be pressed for information, led or cross-examined or given false assurances of absolute confidentiality. Such well-intentioned actions could prejudice Police investigations.

It is important that the young person/ vulnerable adult should not be asked to repeat the information to a colleague or write the information down. Making an accurate and verbatim record of what the young person/ vulnerable adult has said (disclosure), (or evidence that has led to the concerns) recording the young person/ vulnerable adult's own words, is the responsibility of the person to whom s/he has disclosed. **This should be recorded, in writing and sent directly to the Safeguarding Team via MyConcern (see section 3).** If a member of staff has a concern about a student and calls in a safeguarding officer then the safeguarding officer is responsible for the initial record as well as any follow on.

Beyond the initial disclosure i.e. Listen, Record, Report - Staff should not investigate concerns or allegations themselves but should report them immediately via MyConcern.

In exceptional circumstances, when it is not possible to locate or contact the Designated Safeguarding Lead or any of the safeguarding team, the Principal, any other member of the Executive or Senior Management Teams or the Designated Governor, a member of staff may make a referral direct to the appropriate Social/Children's or Adult services department. This should be reported to the DSL or the Principal at the earliest opportunity.

3. Reporting

MyConcern

The College uses the MyConcern safeguarding system which can be accessed via the 'AppsAnywhere' section of the staff hub. Safeguarding referrals can be made through this system but as always, **if the concern you have needs immediate attention you should also report this verbally to the safeguarding team as soon as possible and make them aware of the incident.** Please remember, they may not be able to receive or read the notification immediately.

MyConcern can be access via this link - Log in - The Safeguarding Company Authentication

The MyConcern user guide can be accessed via this link - https://studentssolihullac.sharepoint.com/:w:/s/StudentServicesAdmin/EZQWYQhbHlVIkPO4ZPasH3UBANADLMUS7UbQ2pQNi0p3kA?e=XsaYwp

Safeguarding Leads contact details

Name	Campus	Email	Telephone	Mobile
Adam Thomas (DSL)	All	Adam.thomas@solihull.ac.uk	0121 678 7138	07860 720198
Kully Dhaliwal (DDSL)	Blossomfield	Kully.dhaliwall@solihull.ac.uk	0121 678 7033	07809 336105
Peter Stone (DDSL)	Stratford	Peter.stone@solihull.ac.uk	01789 266 245 ext. 3080	07860 720193
Lisa Cain	Woodlands	Lisa.cain@solihull.ac.uk	0121 678 7250	
Pete Haynes (DDSL)	All	Pete.haynes@solihull.ac.uk	0121 678 7363	

4. Students who go missing from Education

A student missing education or who are persistently absent from education may be at increased risk of safeguarding concerns, including neglect, abuse, child criminal exploitation, child sexual exploitation, serious violence, forced marriage, female genital mutilation, mental health difficulties, radicalisation and other forms of harm. Absence from education can be both a symptom of safeguarding issues and an indicator that intervention may be required.

Safeguarding concerns may arise not only where a student is missing from education for an extended period, but also through:

- persistent or repeated absence;
- patterns of absence from specific lessons or activities;

- poor attendance linked to changes in behaviour or wellbeing;
- sudden disengagement from learning;
- repeated lateness;
- periods of unexplained absence;
- absence associated with known safeguarding vulnerabilities;
- students who become difficult to contact or whose whereabouts are unknown.

Attendance concerns that indicate a potential safeguarding risk must be referred immediately to the Safeguarding Team through MyConcern and, where necessary, verbally escalated without delay. Attendance concerns should not be viewed in isolation and should be considered alongside all available information regarding the student's welfare, behaviour, wellbeing, progress and wider circumstances.

5. Safeguarding and Forced Marriages

A forced marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning difficulties or disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.

The Forced Marriage (Civil Protection) Act 2007 provides for three types of applicant who may apply for a forced marriage protection order. They are the victim, anyone on their behalf with the permission of the court and a relevant third party. A relevant third party such as a local authority may apply on behalf of a victim and does not require the leave of the court.

Following the Government's consultation, on 8 June 2012, the Prime Minister announced that the Government has decided to make Forced Marriage a criminal offence.

The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
- Breaching a Forced Marriage Protection Order is also a criminal offence
- The civil remedy of obtaining a Forced Marriage Protection Order through the family courts will continue to exist alongside the new criminal offence, so victims can choose how they wish to be assisted

First steps in all cases if a member of staff suspects or is approached by a student who is being forced into marriage

- See her/him immediately in a secure and private place where the conversation cannot be overheard;
- See the student on his/her own – even if they attend with others;
- Listen carefully and stay calm;
- Do not interview the person, but question normally and without pressure, in order to be sure that you understand what the young person is telling you;
- Do not put words into the person's mouth;
- Reassure him/her about confidentiality i.e. family members will not be informed
- Inform the person that you must pass the information on, but that only those who need to know about it will be told. Inform him/her of to whom you will report the matter;
- Note the main points carefully;
- Make a detailed note of the date, time, place, what the person said, did and your questions etc.;

- Agree a discreet way of contacting him/her in the future; and
- Refer immediately to the DSL

Do Not:
- Send him/her away;
- Approach members of their family or the community;
- Share information with anyone other than the designated members of staff with responsibility for Safeguarding; and
- Attempt to be a mediator.

What to Do When a Student Is Going Overseas Imminently

If a student tells you that s/he is travelling overseas within days, a second meeting may not be possible so you should try to get as much of the following information from the student as is possible before referring to the designated member(s) of staff with responsibility for Safeguarding.

The designated person will need to have as much information as possible to pass on to the Forced Marriage Unit to help them to locate the student and assist to repatriate him/her.

- Follow the first steps set out in section 2; and
- In addition collect as much as possible of the information set out below:

    - A photocopy of their passport for retention;
    - Encourage them to keep details of their passport number and the place and date of issue; and
    - As much information as possible about the family including:

Full name and date of birth of the person under threat, their father's name, any address where they may be staying overseas, potential spouse's name (if known), date of the proposed wedding (if known), the name of the potential spouse's father (if known), addresses of the extended family in the UK and overseas and any known phone numbers.

- Information that only they would be aware of (if the victim is a British national, this may assist any subsequent interview at an Embassy/British High Commission in case another person of the same age and gender is produced pretending to be him/her);
- Details of any travel plans and people likely to accompany him/her;
- A safe means by which to contact him/her e.g. a mobile telephone that will function overseas - record the number;
- Details of the third party in order to maintain contact in case the person contacts him/her whilst overseas or on his/her return;
- An estimated return date. Ask that they contact you without fail on their return; and
- A written statement by the person explaining that they want the police, adult or children's social care, a teacher or a third party to act on their behalf if they do not return by a certain date.

The designated member of staff with responsibility for safeguarding will report details of the case, with full family history, to the Forced Marriage Unit. Only in exceptional circumstances (absence of designated member(s) of staff for safeguarding and senior staff) should this be done directly. If in exceptional circumstances a direct report is made, the designated member of staff should be informed immediately.

Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)

6. Female Genital Mutilation

Female genital mutilation (FGM) is a collective term for all procedures involving the partial or total removal of external female genitalia for cultural or other non-therapeutic reasons. The procedure is typically performed on girls aged between four and 13 years, but in some cases FGM is performed on new born infants or on young women before marriage or pregnancy. The age at which girls undergo FGM varies according to the community. FGM is illegal in the UK. It is also illegal to take a child abroad to undergo FGM. FGM is considered child abuse in the UK and causes physical, psychological and sexual harm.

FGM is much more common than many realise and there are substantial populations from countries where FGM is endemic across the UK, the Birmingham area being one of these.

The College will follow the guidelines published on the DfE website and as with other forms of abuse staff are asked to be vigilant to the risk of it being practised and to report any concerns through MyConcern and inform a safeguarding officer (see section 3).

7. Exploitation

As with all forms of exploitation, staff are asked to be vigilant to the risk of it being practised and to report any concerns through the processes set out in sections 2 and 3 of Part D: Safeguarding Procedures.

The College's safeguarding team will then follow the guidelines published on the local safeguarding children's partnership website - All Age Exploitation Reduction Multi-Agency Safeguarding Procedures for Solihull Link to All Age Exploitation Procedures

8. Child on child Abuse

If one young person causes harm to another, this should not necessarily be dealt with under these safeguarding procedures. However, if may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (eg age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other young people; or
- There are concerns about the intention of the alleged perpetrator.

If the matter is assessed to be abusive and/or there is a serious safeguarding concern this needs to be reported through the normal processes set out in sections 2 and 3 of Part D: Safeguarding Procedures.

Responding to incidents of bullying / child on child abuse

All complaints about bullying should be taken seriously and treated sensitively. It is important to discuss possible/desirable strategies with the victim in the first instance and proceed as appropriate.

- Reassure the student that they have done the right thing in reporting the incident of child on child abuse and it is important to portray a calm, non-judgmental and positive response to the student.

- Do not ask any leading questions. Instead, use restorative questions to ascertain what has happened and capture all the information including who is involved.

- It is important to be honest with the student - do not promise confidentiality.
- Notes will need to be taken regarding the discussion and the staff member will need to ask the student to complete a statement which must be signed by the student, to declare a true reflection of events. It is important staff record facts and do not add their own interpretation.
- If a student decides not to take any further action after reporting the incident the College reserves the right to investigate the incident and pursue an outcome.
- In certain circumstances, if the student is under the age of 18, the College may make the decision to involve the parents or carers.
- If the student or staff member decides the matter is best resolved informally, an accurate record should be kept. In some cases, speaking directly with the person concerned can be enough to end the situation. For example, sometimes students do not realise that their conduct is causing offence and explaining this to them is enough to make them rethink their behaviour.
- If the matter needs to be addressed through a more formal process, then the student disciplinary procedure will be followed
- If there is a serious safeguarding concern this needs to be reported to the College's Safeguarding Team.

Safeguarding and supporting the victim

The college recognises that victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. Dialogue will be kept open and encouraged.

Pastoral support will be provided to the victim of child on child abuse. When a referral is received the triage process will identify internal and/or external support services which can help support student(s) affected by this type of abuse.

The college will do everything reasonably it can to protect the victim from bullying and harassment as a result of any report they have made.

If the victim does move to another educational institution (for any reason), the new educational institution will be made aware of any ongoing support needs.

Safeguarding and supporting the alleged perpetrator

The following principles are based on effective safeguarding practice and will be used to help shape any decisions regarding safeguarding and supporting the alleged perpetrator.

The college recognises that it may be a difficult balancing act to consider. On one hand, the college has a duty to safeguard the victim (and the wider student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.
The college will consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any young person will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

- The college will consider the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a

risk of harm to other young people. Abusive behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice will be taken, as appropriate, from children's social care.

- if the alleged perpetrator does move to another educational institution (for any reason), the college will inform the new educational institution of any ongoing support needs and where appropriate, potential risks to other young people and staff.

Monitoring

After a complaint about bullying has been dealt with by the College, the situation must be monitored to ensure that bullying does not recur and the investigation should include a recommendation as to the person who will be responsible for monitoring the situation and the relevant timescale.

9. Sexual Violence and Sexual Harassment

The College recognises that a whole college approach to preventing child on child sexual violence and sexual harassment is important. All staff should be aware that Sexual Violence and Sexual Harassment can happen between young people in college, what sexual violence and sexual harassment look like and how to report any concerns.

As always when concerned about the welfare of a young person, all staff should act in the best interests of the young person. In all cases, staff should follow general safeguarding principles as set out throughout this guidance.

The college will ensure that reports of sexual violence and sexual harassment are dealt with in a reasonable timeframe.

The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.

Responding to reports of sexual violence and sexual harassment from students

The initial response to a report from a young person/vulnerable adult is important. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

When responding to a report from a young person/vulnerable adult staff should:

- not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further.
- only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- listen carefully to the person, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;

- consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the young person and to listen to what they are saying.
- only record the facts as the young person presents them. The notes should not reflect the personal opinion of the note taker.
- where the report includes an online element, be aware of UKCCIS sexting advice (for schools and colleges). The key consideration is for staff **not to** view or forward illegal images of a child / young person.
- if possible, have two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; and informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.
- Follow the reporting procedure outlined in Section 2 and 3.

Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other young people (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them.

Risk assessments will be recorded and kept under review. At all times, the college will actively considering the risks posed to all students and put adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) will engage with children's social care and specialist services as required.

Action following a report of sexual violence and/or sexual harassment

The College will carefully consider any report of sexual violence and/or sexual harassment. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. However, if the victim asks the College not to tell anyone about the sexual violence or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other young people. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to protect the victim and other young people from harm and to promote the welfare of children;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the young people involved;
- the developmental stages of the young people involved;
- any power imbalance between the young people. For example, is the alleged perpetrator(s) /significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse;

- that sexual violence and sexual harassment can take place within intimate personal relationships between young people
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- whether there are ongoing risks to the victim, other young people, adult students or College staff;
- informing parents/carers (unless this would put the victim at greater risk);
- only sharing information with those staff who need to know in order to support the young people involved and/or be involved in any investigation. For instance, tutors may be asked to monitor the victim's welfare without needing to know that they are a victim of sexual violence or harassment.

Options to manage the report

The College will consider every report on a case-by-case basis. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the college will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, this does not and will not stop the college taking immediate action to safeguard young people, where required.

There are four likely scenarios the college will consider when managing any reports of sexual violence and/or sexual harassment.

1. Manage internally
In some cases of sexual harassment, for example, one-off incidents, the college may take the view that the young person concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, through the disciplinary process and by providing pastoral support.

2. Early help / Family help
The college may decide that the young people involved do not require statutory interventions, but may benefit from early help / family help.

3. Referrals to children's social care
Where a young person has been harmed, is at risk of harm, or is in immediate danger, the college will make a referral to local children's social care. At the referral to children's social care stage, the college will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the young person at additional risk). Any such decision will be made with the support of children's social care. The colleges will not wait for the outcome of a children's social care investigation before putting measures in place to protect the victim and other young people in college.

4. Reporting to the Police
Any report to the police will be in parallel with a referral to children's social care (as above). Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. At this stage, the colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a young person at additional risk.

From April 2017, the use of police bail has been dramatically reduced and will only be used when deemed necessary and proportionate in exceptional circumstances. Consideration will be given to less invasive options to safeguard victims and witnesses and the administration of justice. Therefore, it is less likely that a young person attending college will be on police bail with conditions attached if there are alternative measures to mitigate any risk. In the absence of bail conditions, when there is a criminal investigation, early engagement and joined up working between the college, children's social care and the police will be critical to support the victim,

alleged perpetrator and other young people involved (especially potential witnesses). Where required, advice from the police will be sought in order to help the college manage their safeguarding responsibilities.

There may be delays in any case that is being progressed through the criminal justice system. The colleges will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other young people in college.

The end of the criminal process

If a young person is convicted or receives a caution for a sexual offence, the college will update its risk assessment, ensure relevant protections are in place for all the young people at the college and consider any suitable action in light of the student disciplinary policy.

If the perpetrator remains in college along with the victim, the college will set out clear expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding behaviour and certain reasonable and proportionate restrictions.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students. The college will support and protect both the victim and alleged perpetrator, especially from any bullying or harassment (including online).

Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the college will continue to offer support to the victim and the alleged perpetrator for as long as is necessary.

A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The college will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Ongoing response Safeguarding and supporting the victim

The college recognises that victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. Dialogue will be kept open and encouraged.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. The college will work with the victim and recognise that there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities.

The college will do everything reasonably it can to protect the victim from bullying and harassment as a result of any report they have made.

Where the college is able to share the information it will provide the victim with the outcome, or an explanation of any actions taken, or not taken, as a result of the complaint.

If the victim does move to another educational institution (for any reason), the new educational institution will be made aware of any ongoing support needs.

Safeguarding and supporting the alleged perpetrator

The following principles are based on effective safeguarding practice and will be used to help shape any decisions regarding safeguarding and supporting the alleged perpetrator.

The college recognises that it may be a difficult balancing act to consider. On one hand, the college has a duty to safeguard the victim (and the wider student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.
Where the college is able to share the information it will provide the alleged perpetrator with the outcome, or an explanation of any actions taken, or not taken, as a result of the complaint.

The college will consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any young person will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

- The college will consider the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other young people. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice will be taken, as appropriate, from children's social care, specialist sexual violence services and the police.
- if the alleged perpetrator does move to another educational institution (for any reason), the college will inform the new educational institution of any ongoing support needs and where appropriate, potential risks to other young people and staff.

10. Sharing nudes and semi-nudes: how to respond to an incident

What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

Alternative terms used by children and young people may include 'dick pics' or 'pics'.
The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention

•Having regard to the points below, staff should respond following the process outlined in section 2 and 3.

•**Never** view, copy, print, share, store or save the imagery yourself**,** or ask a child to share or download – **this is illegal**.

•If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

•**Do not** delete the imagery or ask the young person to delete it.

•**Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

•**Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

•**Do not** say or do anything to blame or shame any young people involved.

•**Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

For further information Download the full guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (UKCIS, 2020) at www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people.

11. Private fostering

We recognise that private fostering occurs when a child under the age of 16 (or under 18, if the person has a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Such arrangements may come to the attention of college staff through the normal course of their interaction, and promotion of learning activities, with young people. If a member of staff becomes aware that this is the case regarding a young person under 18 who has a disability disabled they should notify the safeguarding via MyConcern.

The college will notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

12. Physical Contact with Students/Restraint

It is not realistic to suggest that staff should never touch students, and they and other staff in College have the right to use reasonable force to control or restrain students in certain circumstances. **Restrictive interventions, including use of reasonable force, in schools (DfE, April 2026)** outlines what types of incidents may require the use of force and what constitutes reasonable force in the following terms:

1. The term ‘reasonable force’ covers the broad range of actions used by most teachers at some point in their career that involve a degree of physical contact with students.
2. Force is usually used either to control or restrain. This can range from guiding a student to safety by the arm through to more extreme circumstances such as breaking up a fight or where a student needs to be restrained to prevent violence or injury.
3. ‘Reasonable in the circumstances’ means using no more force than is needed.
4. As mentioned above, Colleges generally use force to control students and to restrain them. Control means either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of a classroom.
5. Restraint means to hold back physically or to bring a student under control. It is typically used in more extreme circumstances, for example when two students are fighting and refuse to separate without physical intervention.
6. College staff should always try to avoid acting in a way that might cause injury, but in extreme cases it may not always be possible to avoid injuring the student.

Who can use reasonable force?

All members of College staff have a legal power to use reasonable force.
This power applies to any member of staff at the College. It can also apply to people who have temporarily been put in charge of students such as unpaid volunteers or parents accompanying students on a college organised visit.

Using Force

A panel of experts identified that certain restraint techniques presented an unacceptable risk when used on children and young people. The techniques in question are:

- the 'seated double embrace' which involves two members of staff forcing a person into a sitting position and leaning them forward, while a third monitors breathing;
- the 'double basket-hold' which involves holding a person's arms across their chest; and
- the 'nose distraction technique' which involves a sharp upward jab under the nose.

Reporting Incidents of Restraint/ Physical Contact with Students
All incidents must be reported on the incident reporting form.

Staff Training
The college will train security staff in the proper use of restraint.

When can reasonable force be used?

Reasonable force can be used to prevent pupils/students from hurting themselves or others, from damaging property, or from causing disorder; and

In a college, force is used for two main purposes – to control students or to restrain them.

The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.

The following list is not exhaustive but provides some examples of situations where reasonable force can and cannot be used:

Colleges can use reasonable force to:

- remove disruptive students from the classroom where they have refused to follow an instruction to do so;
- prevent a student behaving in a way that disrupts a College event or a College trip or visit;
- prevent a student leaving the classroom where allowing the student to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- prevent a student from attacking a member of staff or another student, or to stop a fight in the college grounds; and
- restrain a student at risk of harming themselves through physical outbursts.

Colleges cannot:

- use force as a punishment – it is always unlawful to use force as a punishment.

13. Incidents involving children with SEN or disabilities

When using reasonable force in response to risks presented by incidents involving young people with SEN or disabilities or with medical conditions, the college will in consider the risks carefully recognise the additional vulnerability of these groups. We recognise our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. By planning positive and proactive behaviour support, through drawing up individual behaviour plans for more vulnerable young people, and agreeing them with parents and carers, the colleges aims to reduce the occurrence of challenging behaviour and the need to use reasonable force.

14. Power to search students without consent

In addition to the general power to use reasonable force described above, **authorised** staff can use such force as is reasonable given the circumstances to conduct a search for the following "prohibited items" **Searching, screening and confiscation, Advice for headteachers, school staff and governing bodies, DfE July 2022**:

- knives or weapons
- alcohol
- illegal drugs
- stolen items
- fireworks
- pornographic images
- any article that the member of staff reasonably suspects has been, or is likely to be, used: to
- commit an offence, or to cause personal injury to, or damage to the property of, any person
- (including the pupil).

Staff should note that if this is deemed necessary the DSL should be informed and will, with the Head of Security, be present at the search. If the DSL is not available the search must be attended by a senior member of staff. The Head of Security may delegate search responsibility to search trained security officers only. If the student refuses to volunteer to a search and the situation warrants it the DSL will contact the police.

15. Safeguarding and Work Placements

Safeguarding should be given equal prominence to health and safety and should be considered as part of the initial assessment of the general suitability of any placement.

<u>Long Term Placements</u>
This guidance refers primarily to long term work placements. Long term work placements refer to activity that takes place regularly (eg. a day a week) over several months (i.e. more than two).

The measures that have to be in place for such activities are as follows:

- The placement will be given a copy of the College's Safeguarding Young People and Adults at risk policy and the **Quick Guide** to Safeguarding Learners which they are expected to endorse. Where a placement has their own designated member of staff (DSL) for safeguarding any safeguarding issues arising at the placement should be dealt with by them in the first instance;

- Where the placement does not have a DSL the placement staff should follow College procedures and contact the College DSL or if the allegation refers to a member of staff the College Principal;
- All staff arranging work placements will have safeguarding briefing / training;
- The person who has prime responsibility for overseeing the student during the placement will be briefed by the placement organiser to ensure they understand the procedures outlined in the Quick Guide to Safeguarding Learners; and
- The person who has prime responsibility for overseeing the student during the placement will ensure that a risk assessment of the placement is carried out.

Short Term Placements

The measures outlined above should relate to short term placements in the following circumstances:

- Where the young person or adult may be vulnerable due to special needs, immaturity, abuse or neglect, substance misuse etc.;
- Where the work placement has a residential component.

16. Services or Activities provided by another Body on College Premises

Where services or activities are provided by another body on College premises the College will continue to have regard to keeping children safe in education (KCSIE) when renting out our facilities. As with all safeguarding allegations, the College will follow these safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO) where necessary. The College will also seek assurance that the body concerned has appropriate policies and procedures in place in regard to safeguarding young people and there are arrangements to liaise with the College on these matters where appropriate.

Young people should not be allowed in areas where builders are working. However, arrangements should be in place via the contract where possible to make sure that any of the contractor's staff who come into contact with young people undergo appropriate checks.

17. Confidentiality and Information Sharing

We recognise that all matters relating to child protection are confidential. We maintain that all matters relating to child protection are to be treated as confidential and only shared in line with Working Together to Safeguard Children guidance.

The Principal or Designated Safeguarding Lead will disclose any information about a young person or vulnerable adult to other members of staff on a need to know basis only. Information will only be shared with agencies who we have a statutory duty to share with or individuals within the college who 'need to know'.

All staff must be aware that the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. All staff have a professional responsibility to share information with other agencies in order to safeguard young people and adults at risk.

All staff must be aware that they cannot promise a young person or vulnerable adult to keep secrets which might compromise the young person or vulnerable adult's safety or wellbeing.

We will always undertake to share our intention to refer a young person or vulnerable adult to Social Care with their parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult Children's Social Work for advice.

When there is a concern that a young person or vulnerable adult is at risk of significant harm, all information held by the education provision must be shared with Children's Social Care, police and health professionals. Section 47 of the Children Act 1989 and sections 10 and 11 of the Children Act 2004 empower all agencies to share information in these circumstances. In the event of any doubt, the DSL should liaise with MASH.

18. Students Consent to the referral

"If the young person or vulnerable adult can understand the significance and consequences of making a referral, his or her views regarding a referral to Children Social Work Services should be obtained and taken into consideration by the referring professional.
Whilst the young person or vulnerable adult's views should be sought, it remains the responsibility of the professional to take whatever action is required to ensure the safety of that child and any other children.

It is important to explain to the child in an age appropriate way how the information will be passed to Children's Social Work Services and/or the Police as the agencies with lead responsibility for the welfare and protection of children.

Where the young person or vulnerable adult does not wish his or her parent to know that they or someone else has made a referral about them, those receiving the referral must consider the wishes and best interests of the young person or vulnerable adult. If the young person or vulnerable adult can be considered as "Fraser Competent", then direct work can be undertaken with the young person or vulnerable adult without parental knowledge or consent; however it is always important to encourage a young person or vulnerable adult to be open and to engage parents unless to do so would increase a risk of harm to the child or young person.

19. Record Keeping

The importance of good clear child welfare and child protection record keeping has been highlighted in the learning from serious case reviews.

- Child protection records must be securely held, separate from the main students file, and in a secure place.
- Access to any records and details of a case will be on a 'need to know 'basis decided on a case by case basis, to enable those people to take appropriate steps to safeguard the students or to carry out their own duties.
- Any contact with other agencies must be recorded as should the rationale for sharing or not sharing information.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome
- the rationale for any decisions made

20. Supervision of Child Protection Work

We recognise that staff working in the college who have become involved with a young person or vulnerable adult who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

There are clear and effective arrangements for staff development and training in respect of the protection and care of students. Staff and other adults receive regular supervision and support if

they are working directly and regularly with students whose safety and welfare are at risk, in line with our supervision policy.

We further support staff as necessary, by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and their line manager, and to seek further support as appropriate. This could include:

- Stress Risk Assessment undertaken by the line manager
- Access to the Employee Assistance Programme - CIC 0800 085 1376, assist@cic-eap.co.uk, well-online.co.uk - username: sbclogin Password: wellbeing
- Referral to Occupational Health for one-to-one counselling

21. Professional Disagreement Procedures (Dispute Resolution)

At no time must professional dissent detract from ensuring that the young person or vulnerable adult is safeguarded. The young person or vulnerable adult's welfare and safety must remain paramount throughout.

In the event that a referring professional does not agree with the proposed response to the referral, the referrer should discuss their concerns directly with the duty Assistant Team Manager or Team Manager in the first instance to seek resolution. Professional disagreements should be dealt with in line with LSCP procedures

22. Transfer

Information about students should follow the young person throughout their education, therefore, for the most part the Child Protection information will go to the young person's next education provider along with their pupil file (also retained until 25th birthday) and CTF from SIMS. The final education provider retains all the information until the young person's 25th birthday. It is essential that this is adhered to:

It is good practice for the DSL of the previous setting and the DSL of the new setting to make the transfer of child protection information directly, allowing them to also verbally discuss any pertinent issues if relevant.

The transfer of all information between settings should be tracked and a record of the transfer kept. If sending in the post, information should be sent as securely as possible (special delivery or secure courier at least) and the new setting informed that the information has been sent and for them to confirm its arrival. If transferring the information electronically please use secure/encrypted email to do so.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new educational setting in advance of a young person leaving. For example, information that would allow the new educational setting to continue supporting young people who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives.

23. Retention

Child Protection information about a young person and held by an Educational setting should be retained for the young person's date of birth plus 25 years then reviewed; this ties in with the Limitation Act. At review, if there is no on-going need to retain (such as open claims/legal case) at that point then the information can be securely deleted or destroyed. *This retention period is recommended on the understanding that the principal copy of the Child Protection record is held with the Solihull Local Authority Social Services team which is kept until the child's 75th birthday.*

Retention and destruction of safeguarding records will be undertaken in accordance with statutory guidance, legal requirements, the College Records Retention Schedule and any prevailing legal hold or preservation requirements that may apply.

The reverse process should be in place when receiving a young person, ensuring the school or college is in receipt of all required information.

PART E: Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers and contractors. The word “staff” is used for ease of description.

1. Introduction

The College recognises that as part of its approach to whole college safeguarding it must ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. By creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical in encourage an open and transparent culture enabling the college to identify concerning, problematic or inappropriate behaviour early and therefore minimise the risk of abuse and ensure that adults working in or on behalf of the college are clear about professional boundaries and act within these boundaries.

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

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

The College also recognises that the Sexual Offences (amendment) Act 2000 established a criminal offence of the abuse of trust affecting teachers and others who are in a relationship of trust with 16-18 year olds; a relationship of trust being one where a member of staff or volunteer is in a position of power or influence over a pupil or student by virtue of the work or nature of the activity being undertaken.

The legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

The principle of equality embedded in the legislation applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust.

In accordance with *Keeping Children Safe in Education 2026,* the College will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Where the college is able to share the information it will provide the involved parties with the outcome, or an explanation of any actions taken, or not taken, as a result of the complaint.

2. Receiving an Allegation from a Young Person or Vulnerable Adult

A member of staff who receives an allegation about another member of staff from a young person or vulnerable adult, or becomes aware of a concern regarding the actions/behaviours of a member of staff, should report this immediately to the Principal and/or Designated

Safeguarding Lead or Deputy DSL, following the guidelines in section 2 Part D for dealing with disclosure. If the allegations are against the Principal or any other senior post holder, the report should be made to the Designated Safeguarding Lead and the Designated Governor, who will inform the Clerk and the Chair/Vice Chair of Governors.

3. Initial Assessment and the role of Case manager

A 'case manager' will lead the investigation. This will be the Principal, or, where the Principal is the subject of an allegation, the Chair of Governors.

The Case Manager will liaise with the Safeguarding Panel (ie the Designated Safeguarding Lead and the Vice Principal HR & Student Services) to undertake initial investigations into any allegation against a member of staff. They will make an initial assessment of the allegation/concerns, consulting with the LADO (Local Authority Designated Officer) and, if appropriate, the Designated Governor and Chair of Governors.

The 'harms threshold'
In assessing the level of concern, an assessment will be made on whether the member of staff/contractor has:

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

The initial assessment should be on the basis of the information received and is a decision whether or not the allegation/concerns meets one of the below levels of allegation/concern:

- Allegation/concerns that do not meet the harms threshold – referred to as 'low level concerns'.
- Allegations that may meet the harms threshold.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

Having conducted this initial assessment, a decision will be made as to whether a disciplinary investigation needs to carried out or, if the allegations meet the harms threshold, other action needs to be taken, as outlined below.

4. Low Level Concerns

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a young person or vulnerable adult does not suggest a member of staff or contractor has met the harms threshold:

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with young people or adults at risk;
- having favourites;
- taking photographs of young people or adults at risk on their mobile phone; or,
- using inappropriate sexualised, intimidating or offensive language
- use of personal phone to contact a student.

Responding to low-level concerns

The designated safeguarding lead (or deputy) shall keep a written record of the action taken in connection with the allegation.

Potential outcomes are:

- The allegation represents a training need (which falls short of behaviour or practice which warrants a disciplinary investigation).
- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the young person or vulnerable adult. The matter should be addressed in accordance with the College disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.
- There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation. The College will consider whether any disciplinary action is appropriate against the individual who made it.

5. Allegations that may meet the harms threshold.

Where the allegation is considered to be either a potential criminal act or indicates that the young person or vulnerable adult has suffered, is suffering, is likely to suffer significant harm or the allegation indicates the person may not be suitable to work with young people or adults at risk, the following procedure should be followed.

Initial response

Where the initial assessments identifies that a young person or vulnerable adult has been harmed, that there may be an immediate risk of harm to the young person or vulnerable adult or the situation or assessed as an emergency, children's social care and as appropriate the Police will be contacted.

Looking after the welfare of the young person/vulnerable adult

The Designated Safeguarding Lead (or Deputy) will be responsible for ensuring that the young person or vulnerable adult is not at risk and will refer cases of suspected abuse to the local authority children's social care.

Subject to agreement from the LADO, police or other investigating agency, the Designated Safeguarding Lead (or Deputy) shall:

- inform the young person/vulnerable adult or parent/guardian/carer making the allegation that the investigation is taking place and what the likely process will involve and likely timescales.
- ensure that the parents/guardians/carers of the young person/vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve and likely timescales.

Investigating and supporting the person subject to the allegation

The Case Manager will discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

Subject to agreement with the LADO, and if appropriate children's social care and the police, the Case Manager shall:

- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- inform the Chair of the Corporation and the designated governor of the allegation and the investigation.

Safeguarding/Child protection enquiries by Social/Children's services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The safeguarding agencies, including the police, have no power to direct the College to act in a particular way; however, the College should assist the agencies with their enquiries.

The College shall hold in abeyance its own internal enquiries while the formal police or Social/Children's services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedure or the disciplinary procedure for senior post holders.

If there is an investigation by an external agency, for example the police, the Principal (or designated person) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Principal (or DSL) is responsible for ensuring that the College gives every assistance with the agency's enquiries. S/he will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Principal (or DSL) shall advise the member of staff that s/he should consult with a representative, for example, a trade union officer.

The Principal (or DSL) shall keep a written record of the action taken in connection with the allegation.

Internal Investigations

Where it necessary to undertake an internal investigation, this should be done through the College's disciplinary procedure and a Senior Manager appointed by the case manager (in consultation with the LADO) to undertake the investigation. Investigations regarding the Principal or any other Senior postholder should be undertaken by the Chair of Governors or Designated Safeguarding Governor.

Potential outcomes

The below definitions will be used when determining the outcome of an allegation.

•**Substantiated:** there is sufficient evidence to prove the allegation;

•**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;

•**False:** there is sufficient evidence to disprove the allegation;

•**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,

•**Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If the allegation is substantiated and

- the person is dismissed, resigns, or otherwise ceases to provide his or her services or
- the College ceases to use the persons services.

The College has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

Following a criminal investigation or a prosecution

The police should inform the LADO and the College immediately when:

•a criminal investigation and any subsequent trial is complete,
•it is decided to close an investigation without charge, or
•it is decided not to continue to prosecute after the person has been charged.
In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care will also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager will consider whether the young person or vulnerable adult and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the College will consider whether any disciplinary action is appropriate against the individual who made it.

If the allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor does it meet the harm threshold set out above. The matter should be addressed in accordance with the Low Level Concern procedure, set out below.

In consultation with the designated senior member of staff and the designated Governor, the Principal or in the case of a senior post holder, the Chair/Vice Chair of Governors shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
- inform the parents/guardians/carers of the alleged victim that the allegation has been made and of the outcome.
- where the allegation was made by a young person or vulnerable adult other than the alleged victim, consideration to be given to informing the parents/guardians/carers of that person also.
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- the outcome of any investigation will be reported to the Corporation.

The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures or the disciplinary procedure for senior post holders.

The member of staff should be informed of:

- the disciplinary charge against him/her.
- his/her entitlement to be accompanied or represented by a trade union representative or friend.
- Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.
- The young person or vulnerable adult making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).
- The Principal and the Chair/Vice Chair of Governors (or designated person) should give consideration to what information should be made available to the general population of the College.

6. Suspension of Staff

Suspension should not be automatic. In respect of staff, other than senior post holders, suspension can only be carried out by the Principal or a designated senior post holder where the Principal has delegated responsibility (as in the disciplinary procedure). In respect of the Principal and other senior post holders, suspension can only be carried out by the Chair of the Corporation (or in his/her absence, the Vice Chair).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties. Any suspension should remain under review in accordance with the College's disciplinary procedure for staff or the disciplinary procedure for senior post holders.

Suspension should only occur for a good reason. For example:

- where a young person/vulnerable adult is at risk.
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

Prior to making the decision to suspend, the Principal or the designated senior post holder (or Chair or Vice Chair of the Corporation) should meet with the member of staff. This should occur with the approval of the appropriate agency from the Local Safeguarding Children's Partnership or Vulnerable Adult Board. In particular, if the police are engaged in an investigation the officer in charge of the case should be consulted.

The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that s/he has the right to be accompanied by a friend. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the meeting is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation. Care should be taken that any such meeting is carried out in accordance with the provisions in the College's disciplinary procedure for staff or senior post holders.

During the meeting, the member of staff should be given, as much information as possible, provided that doing so would not interfere with the investigation into the allegation. In particular the reasons for any proposed suspension should be set out. The meeting is not intended to establish the member of staff's innocence or guilt, but give opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

If the Principal (or Chair/Vice Chair of the Corporation) considers that suspension is necessary, the member of staff shall be informed that s/he is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day. In the event that the Principal or other senior post holder has been suspended, the Chair/Vice Chair of the Corporation will report the suspension in writing to the Corporation and to the Local Authority Designated Officer (LADO) within 2 working days.

Where there is a suspension, the Principal (or Chair/ Vice Chair of the Corporation) should address the following issues:

- the Chair of the Corporation and the Designated Governor should be informed of the suspension in writing and kept informed of the progress of any investigation.
- the Designated Governor will advise the Corporation that a member of staff has been suspended pending investigation. The detail given to the Committee should be minimal.
- where the Principal or another senior post holder has been suspended, the Principal and/ or the Chair or Vice Chair of Governors will need to take action to address the management of the College.
- the parents/carers of the young person/vulnerable adult making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the young person/vulnerable adult making the allegation of the suspension.
- senior staff who need to know of the reason for the suspension should be informed.
- depending on the nature of the allegation, the Principal should consider with the Chair/Vice Chair of the Corporation and the designated Governor whether a statement to the students of the College and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.

The Principal and Chair/Vice Chair of Governors shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The Local Safeguarding Children's Partnership or the Safeguarding Adults Board and external investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. S/he should also be provided with information on progress and developments in the investigation at regular intervals.

The suspension should remain under review in accordance with the College disciplinary procedures.

7. Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

If a member of staff is dismissed, or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to inform the DBS.

Child protection records are to be kept for a minimum of 25 years.

8. Monitoring Effectiveness

Where an allegation has been made against a member of staff, the designated Governor, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the Local Safeguarding Children's Partnership and the Safeguarding Adults Board. Consideration should also be given to the training needs of staff. A report will be made to the Corporation setting out any recommendations.

PART F: SAFER RECRUITMENT

1. Introduction

Safer recruitment is central to the safeguarding of young people, adults at risk and in creating a culture that safeguards and promotes the welfare of young people and adults at risk.
The aim of this policy and procedure is to ensure that staff and volunteers are suitable to work with young people and adults at risk and to deter and prevent people who are unsuitable to work with young people and adults at risk from applying for or securing employment, or volunteering opportunities in colleges.

2. Recruitment and selection procedures

Advert

The College advertises all of its vacancies on line and all adverts consist of:

- The advert text giving a brief description of the role and a summary of the key requirements for the post
- Job description and person specification
- On-line application form
- Guidance notes for applicants

The College will include the following information when defining the role (through the job or role description and person specification):

- the skills, abilities, experience, attitude, and behaviours required for the post; and
- the safeguarding requirements, i.e. to what extent will the role involve contact with children and will they be engaging in regulated activity relevant to young people and adults at risk.

The advert/information for applicants will include:

- the college's commitment to safeguarding and promoting the welfare of young people and adults at risk and will make it clear that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post as per the job description and personal specification; and
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

Application Forms

Where a role involves engaging in regulated activity relevant to young people and adults at risk children the College will include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

The College will provide a copy of its Safeguarding Young People and Adults at risk policy and policy on employment of ex-offenders in the application pack or refer to a link on its website.

The College will require applicants to provide:

- personal details, current and former names, current address and national insurance number;
- details of their present (or last) employment and reason for leaving;
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;

- qualifications. NB the awarding body and date of award will be checked as a condition of employment;
- details of referees/references and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

The College will not accept copies of curriculum vitae in place of an application form.

Shortlisting

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with Young People or Adults at risk. Self-declaration will include:

- if they have a criminal history;
- whether they are included on the barred list;
- whether they are prohibited from teaching;
- information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted;
- if they are known to the police and children's social care;
- any relevant overseas information.

This information will only be requested from applicants who have been shortlisted.
The College will:

- ensure that at least two people carry out the shortlisting exercise
- consider any inconsistencies and look for gaps in employment and reasons given for them; and
- explore all potential concerns
- inform shortlisted candidates that online searches may be done as part of pre-recruitment checks.

In addition, as part of the shortlisting process an online search of shortlisted candidates can help to identify any incidents or issues that have happened, and are publicly available online, which the college may need to explore with the candidate.

Employment History and References

Where possible, the College will obtain references before interview, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview.
The College will:

- not accept open references e.g. to whom it may concern;
- not rely on applicants to obtain their reference;
- ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority;
- obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed;
- secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer;
- always verify any information with the person who provided the reference;
- ensure electronic references originate from a legitimate source.

Selection

The Colleges will use a range of selection techniques to identify the most suitable person for the post. Structure interview questions will be agreed before by those interviewing. These will include:

- finding out what attracted the candidate to the post being applied for and their motivation for working with children;
- exploring their skills and asking for examples of experience of working with children which are relevant to the role; and
- probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.

Any information about past disciplinary action or allegations will be considered in the circumstances of the individual case.
All information considered in decision making will be clearly recorded along with decisions made.

Pre-appointment vetting checks, regulated activity and Recording Information

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks. These checks include:

- verification of a candidate's identity.
- obtaining (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children).
- verification of the candidate's mental and physical fitness to carry out their work responsibilities.
- verification of the person's right to work in the UK, including EU nationals.
- verification of professional qualifications, as appropriate.
- before employing a person to carry out teaching work in relation to children, the college will take reasonable steps to establish whether that person is subject to a prohibition order issued by the Secretary of State.

3. Policy and Procedure for DBS and the Barred Lists checks and Registration

Introduction

The aim of this policy and procedure is to ensure that appropriate DBS and Barred List checks are in place for staff, governors and volunteers across the College.

Under government legislation, Solihull College is obliged to ensure that all staff apply for and receive an enhanced DBS disclosure with children's barred list. The College operates its DBS policy in line with the DBS Code of Practice (available on the College Intranet).

General Principles

The College application form contains a section concerning Rehabilitation of Offenders Act 1974 where applicants are requested to disclose pending criminal convictions, criminal charges or summonses whether or not the conviction is regarded as "spent". The College as an employer is exempt from the provisions of the Rehabilitation of Offenders Act. All successful applicants are informed that the offer of employment is subject to a satisfactory DBS disclosure.

All staff are subject to an enhanced DBS disclosure with children's barred list as the College deems itself to be a "specified place"*. The College undertakes online DBS checks through an umbrella body esafeguarding.

Disclosure information is treated as confidential and only handled by the Safeguarding Panel and the HR team.

Disclosures and information pertaining to these are securely stored on an online portal. Where disclosure certificates are required to be provided they are stored in a central file, which is kept locked away except when in use by the Safeguarding Panel.

Where disclosure certificates are requested members of staff only have to show a DBS disclosure, they may refuse to provide the College with a copy. However, disclosure numbers and records of convictions highlighted will be noted, if present and followed up with the Safeguarding Panel.

Disclosures and records relating to these are not kept for lengthy periods of time, with disclosures being safely destroyed after 6 months of being issued by the DBS. This is in line with DBS requirements.

The College's computerised HR system will hold the following information:

- the date the clearance is issued;
- the disclosure number; and
- the date of the Barred List check.

The College will fund all disclosures for staff.

HR will request and verify evidence as outlined in DBS guidance when completing disclosure applications.

The College will ensure it does not contract staff from an external teaching staffing agency unless the agency confirm they undertake DBS clearance checks for their staff, in accordance with DBS and legislative requirements.

Where there has been a breach of Child Protection Policies and action under the disciplinary procedure has been taken, the College may refer names to the relevant external Government authorities e.g. Local Children's Safeguarding Board and ISA.

<u>Roles and Responsibilities</u>

The Lead Signatory for the College is the Vice Principal HR and Student Services. The College uses esafeguarding they are the counter signatory for the college staff and governor checks. The Clerk to the Corporation needs to ensure HR are advised when new governors are appointed in order that DBS checks are undertaken.

It is the responsibility of the HR team to operate the process described within the policy.

Line managers are responsible for checking that members of their team have followed the appropriate process.

Staff are responsible for applying for disclosure and for declaring any offences, on the College application form.

*Specified place – "paid workers remain in regulated activity even if supervised" ref: Keeping children safe in education Statutory guidance for schools and colleges.

Reporting and Review

The Vice Principal HR and Student Services and the HR team will review this procedure regularly, taking account of legislative changes and the DBS Code of Practice. The Corporation will review the policy annually.

Procedures

New Starters
As the College is a "specified place", all new staff joining the College will be required to complete an enhanced DBS disclosure with children's barred list check and all appointments are subject to a satisfactory DBS check.

All new staff are required to have a Barred List check in place before they start work. A completed DBS form and supporting evidence will also need to be provided. HR will advise Line Managers when this is complete and also when full clearance is received. However, the College accepts that due to operational reasons members of staff may be required to start before DBS clearance is received. In these circumstances a risk assessment needs to be in place and actions taken to ensure no one to one contact is required and the individual is appropriately supervised.

HR must make sure that every effort is made to ensure a quick turnaround on the application and receipt of the DBS clearance.

Existing Members of Staff
Existing members of staff must declare any criminal offences or cautions that they receive during their employment with Solihull College.

The DBS will be formally notified of individual staff details where disciplinary action has led to dismissal and the College deems that the individual's behaviour is such as to put young and vulnerable people at risk. The DBS will decide whether to take further action.

DBS Rechecks
The policy for rechecking staff will be reviewed annually and reported to the governing body.

The College takes a risk-based approach to the rechecking of staff with new Enhanced DBS disclosures with children's barred list check. All staff are required to complete and sign an annual declaration of any new criminal convictions.

As a matter of course, staff will be required to undertake a new DBS clearance check when they move to a different role within the College that:

- Involves greater access to students, or student data/personal data
- Necessitates increased contact with learners, particularly where this involves one to one contact
- Has a greater level of responsibility and/or position of trust

In addition to this the College might consider a recheck for a member of staff who:

- have failed to undertake mandatory training relating to safeguarding
- have had low level concerns raised
- haven't completed the annual declaration.

A list of possible changes to a member of staff's role have been considered below as guidance:

DBS recheck list

Current role	New Role	DBS recheck required Y/N
Lecturer	Assessor	Y
PT Lecturer	Lecturer	Y
Lecturer	Assessor	Y
Assessor	Lecturer	Y
Technician	Lecturer	Y
LSA	Invigilator	N
Support Worker	Lecturer	Y
Admin - Frontline	Lecturer	Y
LSA	Clerical	N
Lecturer	Manager	Y
Lecturer	Support Worker	Y
Admin - e.g. Exams	Admin - e.g. Student Services	risk based judgement
Any role	LSA	Y

In considering changes to roles that sit outside of the above, a risk-based judgement will be made, considering for example:

- promotion within a team
- the level of contact with students
- student data
- location

Where there is an increase in their dealings with anything relating to students, this would trigger a recheck.

If an individual has had a DBS check recently and they change their role a recheck will take place.

Governors
Governors will be required to agree to a DBS enhanced disclosure with children's barred list. They will also be issued with a visitors badge when attending the College premises and must wear this at all times whilst on College premises.

Volunteers
It is the responsibility of the area manager to ensure that details of volunteers are passed to HR in order that appropriate checks are in place. DBS clearance is required before a volunteer can start at the College.
Such volunteers must be issued with a staff ID card. Authorisation will be given by the HR manager in order that an ID card can be issued.

Volunteers must also complete a volunteer checklist which will be kept in HR as a central register of Volunteers. It is the responsibility of the employing Manager to advise HR when Volunteers leave in order that an accurate record of current volunteers can be maintained.

Consultants

In the case where consultants are likely to work for the College on a regular or for a sustained period, the College should ensure appropriate checks have taken place either through the College or with the supplying agency.

Visitors
It is not necessary or practical for the College to require a DBS disclosure for visitors who may have not or only have incidental contact with children and adults at risk and will only be in the College for a short period of time. In all cases such individuals must sign in and out via reception and will be issued with a visitor's card by Reception staff. The relevant member of College staff will be required to meet the visitor in reception.

Responsibility for supervision of these visitors will lie with the employee they are meeting or working for.

Criminal Convictions

Where an applicant discloses a criminal conviction on their application form this should be discussed with the candidate if selected for interview.

When a DBS disclosure indicates conviction or caution the HR Manager will arrange to meet them to discuss the nature of their conviction. Each case will be dealt with on an individual basis, depending upon the nature of the conviction and the job role of the member of staff. This information will be forwarded for consideration by the Safeguarding Panel which comprises:

- Vice Principal HR and Student Services (Deputy DMS);
- Designated member of staff for Safeguarding (Director of Student Services) and / or designated Deputy.

In the absence of one of the above, the HR Manager

If it is deemed that the conviction(s) do not pose a safeguarding risk the matter will be taken no further and the member of staff will be advised accordingly.

If the panel feels that the nature of the conviction(s) are such that the offer of employment should not be made or withdrawn the panel will refer the matter to the Principal for a final decision. If it is deemed that the convictions are not acceptable the offer of employment will be withdrawn.

In the case of existing staff, if a caution/conviction is disclosed and following an assessment of risk to Children and Adults at risk the College decides that the employee is unable to continue in their current role, the College will consider options of alternative employment within the College. However, if it is felt that the caution / conviction is sufficiently serious dismissal would take place in accordance with the Instrument and Articles of Government.

Recording Information

The college maintains a single central record of pre-appointment checks. The single central record covers the following people details of staff, including agency and supply staff providing education to young people under the age of 18.

The single central record will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

- an identity check;
- a children's barred list check;
- an enhanced DBS check requested/clearance provided;
- a prohibition from teaching check;

- further checks on people who have lived or worked outside the UK
- a check of professional qualifications, where required; and
- a check to establish the person's right to work in the United Kingdom.
- whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18.

The details of an individual will be removed from the single central record once they no longer work at the College.

Whilst they are not employees of the College, the single central record will also contain the following information about contractors and agency staff:

- Name
- Role
- DBS check clearance date and number

PART G: IMPORTANT CONTACTS

Contact details for a referral for young people residing in:

Solihull MBC Contacts

- MASH: 0121 788 4300
- Out of hours: 0121 605 6060
- Children's Social Work Child Protection and Review Unit: 0121 788 4310
- Local Authority Duty Officer (LADO) – 0121 788 4310
- SMBC Adult Social Work one stop referral – 0121 704 8007
- Early Help/Family help team – 0121 709 7000

Birmingham Contacts

- Birmingham Multi-Agency Safeguarding Hub (MASH) - 0121 303 1888
  Home - Birmingham Safeguarding Children Partnership (lscpbirmingham.org.uk)

Coventry Contacts

- Coventry Multi-Agency Safeguarding Hub (MASH) - 024 7678 8555
  Coventry's Multi Agency Safeguarding Hub (MASH) – Coventry City Council

Warwickshire Contacts

- Children's Social Care during office hours: 01926 410410
- Emergency Duty Service 01926 886922 outside office hours only
  Home | Warwickshire Safeguarding Adults and Children's Board (safeguardingwarwickshire.co.uk)

Worcestershire Contacts

- Access Centre 01905 822666 from Monday to Thursday 8.30am to 5.00pm (until 4:30 pm on Friday)
- Emergency Duty Team (EDT) on 01905 768020 outside office hours
  About Us - Worcestershire Safeguarding Boards (safeguardingworcestershire.org.uk)

Where the young person or adult at risk does not reside in one of the above areas the referrals must be made to the appropriate cross border local authorities. These must also be confirmed in writing.

Reviewed by	Created	Last Reviewed	Next Review Date	Total Pages
Adam Thomas / Pete Haynes	December 2009	October 2026	October 2027	64