SAFEGUARDING, CHILD PROTECTION, PREVENT AND ONLINE SAFETY POLICY

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About Us

Access Further Education Ltd ('The College') has subsidiary companies, trading names and trading partnerships through which it operates. The trading names and partnerships might have their own names or brands, but the legal entity for the purpose of this policy is Access Further Education Ltd. Trading subsidiaries, trading names and trading partnerships include Access Creative College ('ACC'), Access Industry ('AI') and Access Sport College ('ASC'). The dBs Institute (DBS Music UK Holdings and its subsidiaries), whilst a separate legal entity, shares common Directorships with the College.

1. Safeguarding, Child Protection, Prevent and Online Safety policy statement

The College has an ethical and statutory obligation towards the safety, welfare and wellbeing of its staff and learners. For the purposes of this policy, the word 'learner' covers all those engaged in learning within the College including centre based learners, apprentices and trainees.

The College believes that the welfare of the individual is paramount and recognises its duty and responsibility to protect when there is a cause for concern.

This policy applies equally to children, young people, and adults at risk. The College recognises its statutory responsibilities under both child safeguarding legislation and adult safeguarding duties. For learners aged 18 and over, safeguarding practice will be informed by the Care Act 2014, including principles of wellbeing, prevention, proportionality, protection, partnership, and accountability.

Although the two terms, 'Safeguarding' and 'Child Protection' are not synonymous, they are often used interchangeably. However, Safeguarding is protecting learners from potential harm and maltreatment as soon as concerns arise, whilst Child Protection refers to those young people aged 17 or under who are affected by, or at risk of, significant harm. The College will also ensure that appropriate and complementary systems relating to adults i.e. those aged 18 or over are also in place.

The College recognises its duties under section 26 (10 of the Counter terrorism and Security Act 2015) and the

requirements to prevent people from being drawn into terrorism. Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy.

The Prevent Duty Guidance outlines that education settings should understand the requirement to help prevent individuals from being drawn into terrorism as part of the wider safeguarding responsibilities. In the same way that support is provided to people at risk of involvement with drugs, gangs, or other forms of harm, individuals vulnerable to being groomed into radicalisation can also be helped.

Prevent is an integral part of safeguarding and the College's Prevent Duty Risk Assessment and action plan support this policy and aim to ensure a safe, tolerant and respectful community. Guidance information also ensures the CHANNEL referral process is clear for all Designated Safeguarding Lead (DSL)s to follow if required.

All staff and learners have the right to:

- Live and work in a safe environment and be protected from harm
- Experience emotional well-being
- Feel valued and be supported by a network of professional relationships
- Have a positive self-image
- Have a secure sense of cultural, social and racial identity
- Develop good interpersonal skills and confidence in social situations

The College believes:

- In demonstrating our full commitment to the significance of the Equality Act 2010 within our safeguarding practices, the College will not unlawfully discriminate against learners because of their protected characteristics.
- That all staff and learners without exception have the right to protection from abuse regardless of sex, gender reassignment, race, ethnicity, disability, age, religion, sexual orientation or beliefs and the right to challenge and protection from extremist behaviour, ideologies or those who promote them. Any allegations of abuse including attempts to radicalise learners will be taken seriously and responded to appropriately.

The College is committed to anti-discriminatory safeguarding practice. We recognise that some learners may be more vulnerable to harm due to factors such as race, gender, disability, sexual orientation, or socio-economic background. Staff are expected to be aware of potential bias and ensure that all safeguarding decisions are fair, proportionate, and responsive to individual need.

The College is committed to supporting and ensuring that measures to end the abuse and degrading treatment of individuals and groups through modern slavery and human trafficking are in place and do not form part of the conduct of business by the College, its partners or supply chain.

The College is committed to online safety for staff and learners and will adopt practices to:

- Ensure the safety and wellbeing of young people and adults is paramount when they are using the internet, social media or mobile devices.
- Provide staff and volunteers with the overarching principles that guide our approach to online safety.
- Ensure that, as an organisation, we operate in line with our values and within the law in terms of how we and our learners use online devices.

The College is committed to the principle of safe recruitment, selection and vetting of all staff.

Safeguarding is everyone's responsibility. All staff have a duty to identify concerns, take action, and contribute to a culture of safeguarding throughout the College.

A Safeguarding Quick Guide for Staff is provided in Appendix 13 and must be followed by all staff.

1.1 What all staff must do if they have a safeguarding concern

Safeguarding is everyone's responsibility. All staff must act immediately if they have a concern about a learner.

All staff must:

- **Identify**: Recognise signs of abuse, neglect, exploitation, or risk
- **Respond**: Listen, reassure, and do not promise confidentiality
- **Record**: Log the concern on the College safeguarding system immediately (and within 24 hours at the latest)
- **Report**: Inform a DSL **on the same working day**
- **Escalate**: If a learner is at immediate risk of harm, contact emergency services and inform a DSL immediately
- Consider whether a learner aged 18+ may be an adult at risk and apply appropriate safeguarding procedures

2. Management of Safeguarding, Child Protection, Prevent & Online Safety

All members of the Access Further Education (AFE) Limited Board, as well as the AFE Quality & Operations Senior Management Team (SMT), will undertake safeguarding training to ensure they understand their responsibilities.
The Board is fully committed to ensuring that:

- The Safeguarding, Child Protection & Prevent Policy meets statutory requirements and contains up-to-date information and references
- The Prevent Duty Risk Assessment is up to date and progress against actions is monitored
- The Safeguarding, Child Protection and Prevent procedures guidance clearly sets out what staff should do if they have a concern about a learner
- The most up-to-date Safeguarding, Child Protection and Prevent Policy is available on the website
- The Board has oversight of online safety systems used throughout the College

The Board does not treat the receipt of reports as assurance in itself. Assurance is achieved only where the Board has tested, challenged, and satisfied itself that safeguarding systems are working effectively in practice, and can evidence how it has done so through minuted discussion and follow-up actions. This ensures that safeguarding practice is continuously reviewed, challenged, and improved.

The work of the College's Site/Campus DSLs is supported through access to appropriate external agencies and support services. This includes links established with the DfE Regional Prevent Coordinators, whose local knowledge informs updates to each centre's Prevent Duty Risk Assessment.

The Board receives and reviews recommendations submitted, and determines/approves any amendments to policies and procedures. The Board also notes the outcomes of any serious case reviews or reports from external bodies in determining appropriate arrangements to be implemented.

Every organisation has a legal duty to nominate a senior member (or several senior members) of staff to advise and guide on issues relating to allegations of, or suspected, abuse. These persons are trained in related legislation and procedure and should be contacted as a matter of urgency as soon as a case presents itself.

Every College centre has a Learner Support Manager (LSM), or Assistant Head of Student Support Maths & English (AHSS), who acts as the lead DSL on site and is designated as the Site/Campus DSL. In addition, all Heads of Centre and named managers within apprenticeship provision are safeguarding-trained to support the Site/Campus DSL. Larger centres have additional safeguarding-trained staff to support the Site/Campus DSL. Partners of the College will also have a named safeguarding contact who links with the Head of Safeguarding.

The College's centres and partners work with two National Designated Safeguarding Leads (NDSLs) in the Central

Management team: the Head of Safeguarding (Senior NDSL) and the Safeguarding Manager (NDSL), who oversee the national safeguarding and Prevent picture and the implementation of this policy and practice at local level.

The Site/Campus DSL has overall responsibility for safeguarding and child protection at their centre. This includes:

- Managing safeguarding referrals and working with external agencies
- Acting as a point of contact for staff
- Ensuring all staff receive appropriate safeguarding training
- Maintaining accurate and secure safeguarding records
- Promoting a culture of safeguarding across the College
- Ensuring that the Site/Campus DSL, or an appropriately trained deputy, is available and accessible during all operational hours at each College site or provision where learners are present. Clear and effective cover arrangements must be in place whenever the Site/Campus DSL is unavailable, including during sickness, annual leave, training, meetings or other periods of absence. Staff must know who the Site/Campus DSL or their deputy is, how they can be contacted, and how to escalate a safeguarding concern if their first point of contact is unavailable

The College will maintain clear national and local safeguarding arrangements so that responsibility for receiving, responding to, and escalating safeguarding concerns is not dependent on the availability of an individual Site/Campus DSL. Each site or provision must have a named Site/Campus DSL, with a nominated deputy for cover, and appropriate escalation to the NDSLs where local safeguarding support is unavailable or additional expertise is required.

Where the Site/Campus DSL is unavailable, safeguarding concerns must continue to be received, recorded, assessed and acted upon without delay. The College will maintain appropriate communication arrangements — which may include a dedicated safeguarding email address, telephone contact, or other secure communication system — to ensure continuity of safeguarding activity.

The Designated Safeguarding Lead, either nationally or at centre level as appropriate, will also coordinate arrangements for onward referrals to relevant external agencies, including:

- Local Authority Safeguarding partners, including Children's Social Care and Adult Social Care, alongside health services, police, Prevent partners, and other relevant safeguarding agencies
- NDSLs who will also liaise with partners and sub-contractors in conjunction with relevant link managers, to ensure that appropriate notifications and escalation routes are maintained in line with relevant partner and sub-contract arrangements

There are multi-agency safeguarding arrangements in place at a local level. The safeguarding partners are the local authority, the Integrated Care Board (ICB) for the area, and the chief officer of police. These partners coordinate responses to safeguarding concerns, including situations involving immediate risk, and ensure that local providers are fully engaged, involved, and included in safeguarding arrangements. The organisation will cooperate with relevant local safeguarding arrangements and safeguarding partners, and will participate in multi-agency safeguarding activity where appropriate and in accordance with its legal and contractual responsibilities.

The College will actively engage with local safeguarding arrangements and understands its role as a relevant agency. This includes contributing to multi-agency safeguarding activity, sharing information, and participating in local safeguarding reviews where appropriate.

It is important that all issues are handled with sensitivity and respect. All individuals have the right to make important decisions about their own lives.

Learner's Wishes, Feelings and Lived Experience

The College will ensure that the wishes, feelings and lived experience of the learner are considered throughout the safeguarding process. Learners will be treated with dignity, respect and sensitivity and, wherever possible, will be supported to understand what is happening, why information may need to be shared and what options for support are available to them.

The learner's views and experiences will inform safeguarding assessment, decision-making and the support provided. Staff should take account of the learner's age, understanding, communication needs, individual circumstances, capacity and any factors that may affect their ability or willingness to disclose concerns.

Listening to the learner does not mean that the College will always be able to act in accordance with their wishes. Where there is a safeguarding concern, the College may need to take action, share information or make a referral without the learner's agreement where this is necessary to protect them or another person. Wherever appropriate, the learner should be informed of the reasons for such action.

Staff should avoid making assumptions about what a learner wants or needs. The learner should be given appropriate opportunities to express their views and should be supported to participate in decisions affecting them, wherever it is safe and appropriate to do so.

Where a learner's wishes cannot be followed, the reasons for the decision should be explained to them wherever appropriate and recorded as part of the safeguarding process.

The learner's lived experience should be considered alongside professional judgement, contextual information, identified risks and relevant safeguarding duties. The College will seek to ensure that the learner's voice is not lost when decisions are made about their safety and wellbeing.

Safeguarding Process Overview

1. **Concern identified-** This may include child-on-child abuse, harmful sexual behaviour, sexual harassment, sexual violence, sexualised behaviour, misogyny, bullying, exploitation or patterns of concerning behaviour.
2. **Immediate risk?** → Contact emergency services
3. **Record on MyConcern**
4. **Report to DSL** (same day)
5. **DSL risk assessment**
6. **Action**:
    a. Family Help/Early Help
    b. Internal support
    c. Referral to the appropriate external agency in accordance with local safeguarding arrangements and published thresholds (e.g. Children's Social Care/MASH, Police, Prevent or other specialist services).
7. **Ongoing monitoring and review**
8. **Record all actions**

Adult Safeguarding Process (Learners 18+)

Where a safeguarding concern relates to an adult at risk, the following process will apply:

1. Concern identified
2. Immediate risk? → Contact emergency services
3. Record on MyConcern
4. Report to DSL (same day)
5. DSL risk assessment, including consideration of capacity and consent

6. Action:
    - Internal support / Early Help
    - Referral to Adult Social Care (where threshold met)
    - Police or other agencies (if required)
7. Ongoing monitoring and review
8. Record all actions

Professional Conduct when Receiving a Disclosure

Staff and adults in education are well placed to notice possible signs of abuse, extremism or radicalisation in young people and adults at risk because of their regular contact.

Signs of abuse, extremism or radicalisation may be obvious and sudden, for example an injury or the actions of the individual; or part of a picture over a longer period, perhaps including:

- Behaviour that is unusual for the individual, or for their age;
- Work falling behind or lack of interest;
- Isolation or introversion;
- An unexplained change in attendance levels including learners who are 'absent' from education;
- Promotion or expression of extreme views or information or a heightened interest in information, electronic or physical, including websites, chat rooms or the repetition of the extreme views of other individuals. It may be that they disclose that approaches have been made to them or others that they are aware of or that pressure has been applied to accept views or doctrines which promote extremist behaviours or have been asked to participate in such behaviour.

In all these cases, there are things you should do:

- Treat the matter seriously and reassure the individual if necessary;
- React to what the individual tells you with belief;
- Listen to what is said carefully but avoid asking probing questions; simply ask any questions needed to clarify what is being said;
- Make it clear that you will probably have to inform others;
- Tell only those who need to know;
- Seek advice if in doubt;
- Keep a careful watch on the individual;
- Record what you have noticed using the appropriate safeguarding reporting system, reporting what has happened and what you have done;
- If there is an urgent or serious risk or cause for concern, in addition to using the appropriate reporting system, ensure that you speak with the DSL or a manager so an immediate intervention can be made where appropriate;

There are things you should not do:

- Do not promise to keep the matter secret/confidential, even if the individual asks you to.
- Do not interrogate individuals or ask leading questions.
- Do not contact either Social Services or the Police yourself, contact a DSL in the first instance and use the appropriate reporting system DSL.
- Do not speak with anyone about whom allegations are made.
- "All staff are expected to demonstrate professional curiosity (see Section 3.8)."

2.1 Safeguarding in Apprenticeship and Workplace Settings

The Head of Operations and two further DSLs link with the National DSLs in the same way as centre safeguarding teams, to provide regular oversight of any cases.

Employers are required to take an active role in safeguarding apprentices and must understand their responsibility to report concerns immediately. Employers must link with the Industry Practitioner (IP) or College DSL immediately in response to any safeguarding or Prevent concern.

The College will ensure that all employers engaged in apprenticeship provision are provided with clear safeguarding guidance, including reporting procedures and escalation routes. Safeguarding expectations are outlined within employer agreements and reinforced through ongoing engagement with employers.

Within the apprenticeship provision, Designated Safeguarding Leads (DSLs) will work closely with Industry Practitioners (IPs) and employers to ensure that:

- Safeguarding concerns arising in the workplace are reported immediately and recorded on the College safeguarding system
- Appropriate action is taken in response to concerns, including referral to external agencies where required
- Apprentices receive timely and appropriate support to promote their safety and wellbeing
- Communication between the College and employer is clear, timely, and proportionate to risk

Within the apprenticeship team, DSLs link with the relevant IP to ensure that appropriate support is put in place for the apprentice and that the employer is updated as necessary to promote the apprentice's wellbeing.

Regular safeguarding check-ins form part of apprenticeship progress reviews, ensuring that apprentices are given opportunities to disclose concerns and discuss their wellbeing in both College and workplace contexts.

All safeguarding actions, decisions, and escalation between employer and provider will be formally recorded in line with College safeguarding procedures.

The College recognises that apprentices spend a significant proportion of their time in employer settings, where safeguarding risks differ from those in centre-based environments. As such, the College adopts a contextual safeguarding approach to ensure apprentices are protected both on and off-site.

All employers engaged in apprenticeship provision are required to:

- Understand their safeguarding responsibilities
- Act immediately on any safeguarding or Prevent concerns
- Report concerns to the College via the agreed reporting routes
- Provide a safe working environment that complies with safeguarding expectations

Apprentices must be informed at induction of:

- How to report safeguarding concerns in the workplace
- Who their DSL is
- How to access support both within the workplace and through the College

Employer Responsibilities, Workplace Risk and Escalation

Employers have a shared responsibility with the College to safeguard apprentices and must take reasonable and proportionate steps to provide a safe working and learning environment. This responsibility applies to safeguarding, child protection, Prevent, online safety and any other circumstances in which an apprentice may be exposed to harm, abuse, exploitation, harassment, coercion or inappropriate behaviour.

Employers must:

- ensure that apprentices are provided with a safe working environment and appropriate supervision;
- ensure that staff who supervise or work closely with apprentices understand their safeguarding responsibilities and know how to report concerns;
- act immediately where a safeguarding or Prevent concern is identified or disclosed;
- report safeguarding concerns to the College DSL or agreed College safeguarding contact on the same working day;
- cooperate fully with the College in the assessment and management of safeguarding concerns;
- provide the College with relevant information required to assess risk and safeguard the apprentice;
- take reasonable immediate steps to reduce or remove any identified workplace risk;
- support apprentices to report concerns without fear of disadvantage, retaliation or being treated adversely as a result of raising a safeguarding concern; and
- cooperate with any safeguarding action, review, monitoring arrangement or escalation required by the College.

The College recognises that workplace safeguarding risks may arise from the nature of the work, the workplace environment, relationships with colleagues or members of the public, lone working, travel, power imbalances, professional boundaries or the behaviour of individuals within the workplace. The College will consider these contextual factors when assessing safeguarding concerns and determining appropriate support and protective measures.

Where a safeguarding concern indicates that an apprentice may be at immediate or continuing risk of harm, the priority will be to secure the apprentice's safety. This may include temporary changes to working arrangements, increased supervision, removal from a particular environment or activity, suspension of a placement or other proportionate protective action while the concern is assessed. Such decisions will be made by the College DSL in consultation with relevant College staff and, where appropriate, the employer and external safeguarding agencies.

Failure of an Employer to Respond

Where an employer does not respond appropriately or promptly to a safeguarding concern, the apprentice or any member of College staff must not be required to wait for the employer to resolve the matter before action is taken.

The concern will be escalated to the College DSL and, where appropriate, the National DSL or Head of Safeguarding. The College will assess whether the apprentice can safely remain in the workplace while the concern is being addressed.

Where necessary, the College may:

- require additional safeguarding measures to be implemented by the employer;
- increase monitoring or contact with the apprentice;
- review or suspend the apprentice's workplace arrangements;
- consider an alternative placement or working arrangement;
- make a referral to Children's Social Care, Adult Social Care, the Police, Prevent or another relevant safeguarding agency; and/or
- take appropriate action under the employer agreement or apprenticeship arrangements.

Where there is disagreement between the employer and the College about the level of safeguarding risk or the action required, the College DSL will determine the safeguarding response. The safety and wellbeing of the apprentice will take

priority over operational or commercial considerations. The rationale for decisions, actions taken and any escalation will be formally recorded.

No apprentice will be disadvantaged for raising a genuine safeguarding concern or for seeking support from the College where they do not feel safe reporting a concern within the workplace.

All safeguarding concerns involving an employer, workplace colleague or other person connected with the placement will be managed in accordance with the College's safeguarding procedures, information-sharing requirements and relevant external safeguarding arrangements.

2.2 Workplace Reporting Procedure

Reporting Safeguarding Concerns in Employer Settings. Where a safeguarding concern arises in the workplace:

1. The apprentice should report concerns to:
    - Their employer supervisor/manager AND/OR
    - Their Industry Practitioner (IP) or College contact
2. Employers must report concerns to the College DSL or via the agreed safeguarding reporting system and no later than the same working day
3. All concerns must be recorded on the College safeguarding system (e.g. MyConcern) within 24 hours
4. In cases of immediate risk, emergency services must be contacted immediately
5. The College DSL will assess the concern and determine appropriate action, including referral to external agencies where required

Escalation Between Employer and Provider

The College has clear escalation arrangements in place to ensure safeguarding concerns are managed effectively **across** employer and provider boundaries:

- Where an employer fails to act on a safeguarding concern, the College will escalate directly to the DSL and, where necessary, external safeguarding agencies
- Where there is disagreement between the employer and College regarding risk, the College DSL decision is final in matters of safeguarding
- All escalation actions will be formally recorded
- Serious concerns will be escalated to external agencies (e.g. Local Authority, Police, Prevent Coordinator) immediately

3. Scope and definitions

This policy statement applies to all staff, volunteers, young people and anyone involved in the College's activity, including in:

- The provision of learning programmes, including T Levels, for learners aged 16+ both in our centres and in work placements
- The provision of apprenticeships
- The provision of traineeships
- Mental health continues to be a significant concern—for young people with overwhelming demand for external specialist support services. The College is committed to supporting learners until referrals for specialist support are successful.

3.1 Safeguarding

Safeguarding is a term which encompasses more than 'child protection' as it also includes the concept of prevention and the active promotion of wellbeing. It reflects, therefore, a climate of being prepared, rather than reacting to a

situation or event after it has taken place. Both mental and physical health or development are relevant to safeguarding and the welfare of children and young people.

The Children Act 1989 defines a child as “a person under the age of 18”. This could therefore include:

- Any learner up to the age of 18
- Any other person under the age of 18 who becomes known to The College, including visitors and staff.

Where reference is made within this policy, to children and young people, this term is used to mean those under the age of 18. The organisation will follow the safeguarding arrangements, referral pathways and published thresholds of the relevant local authority in which the child or young person is located. This includes working in accordance with the local authority's published arrangements for Early Help/Family Help, Children's Social Care, the Multi-Agency Safeguarding Hub (MASH) or equivalent front-door arrangements, and other relevant safeguarding services.

Where a safeguarding concern meets the relevant threshold for statutory intervention, the DSL will make a referral to the appropriate local authority Children's Social Care service without delay. Where the concern does not meet the statutory threshold, the organisation will consider whether Early Help/Family Help or another form of coordinated support is appropriate.

As an Independent Training Provider operating across multiple locations and workplace settings, the organisation recognises that safeguarding thresholds, referral routes and local arrangements may differ between local authorities. DSLs will therefore ensure that referrals are made using the current local arrangements and published thresholds applicable to the location in which the child or young person is based or where the safeguarding concern has arisen.

Where an apprentice or learner is located in a different local authority from the organisation's centre or the employer's registered location, the relevant local authority arrangements for the **child or young person's location** will be considered.

The term ‘adult at risk’ is used throughout this policy (previously referred to as ‘vulnerable adult’) and reflects current safeguarding terminology and practice. An adult at risk is a person of 18 years of age or older who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is, or may be, unable to take care of themselves, or be unable to protect themselves against significant harm or exploitation. An adult at risk may therefore be a learner who, for example:

- Is an older person who is frail due to ill health, physical disability or cognitive impairment
- Has a learning disability
- Has a physical disability and/or a sensory impairment;
- Has mental health needs including dementia or a personality disorder
- Has a long-term illness/condition
- Misuses substances or alcohol
- Is a carer such as a family member/friend who provides personal assistance and care to adults and who is subject to abuse
- Lacks the mental capacity to make particular decisions and is in need of care and support.

Where safeguarding concerns relate to an adult at risk, the College will consider the individual’s ability to make informed decisions (mental capacity). Where an adult has capacity, their consent to share information will normally be sought. However, information may be shared without consent where there is a risk of serious harm to the individual or others, or where it is necessary to prevent crime. Decisions will be proportionate and recorded.

The College recognises that effective safeguarding depends on timely and appropriate information sharing. Staff should

be confident in sharing information with safeguarding partners where there are concerns about a learner's welfare.

Fears about sharing information must not prevent action being taken to safeguard and promote the welfare of learners. Information will be shared in accordance with applicable data protection legislation. Data protection legislation does not prevent the College from sharing information where there is a lawful basis and the sharing is necessary, proportionate and relevant to safeguarding and promoting the welfare of a learner. Staff should not allow concerns about data protection to prevent appropriate information sharing where there is a safeguarding concern. Decisions about information sharing should be proportionate, recorded, and made in accordance with the College's information-sharing procedures.

3.2 Child-on-child abuse / Child-on-child violence

The organisation recognises that children and young people can experience abuse and harm from their peers. This may include bullying, harassment, sexual harassment, sexual violence, harmful sexual behaviour, sexualised behaviour, misogyny, gender-based hostility, coercive or controlling behaviour and other forms of abuse.

Staff should remain alert to patterns of behaviour, including repeated incidents or behaviours that may appear low-level when considered individually but may indicate a wider pattern of harm, abuse or exploitation when considered cumulatively. Concerns should therefore not be assessed solely on the basis of the individual incident.

Harmful sexual behaviour may occur both online and offline and may involve children and young people of any age, sex or background. The organisation will respond proportionately and according to the circumstances, recognising that children who display harmful or inappropriate sexual behaviour may themselves be experiencing abuse, exploitation or other safeguarding concerns.

Staff must report concerns promptly through the organisation's safeguarding procedures and should not attempt to determine whether behaviour meets a particular threshold before reporting it. The DSL will consider the context, frequency, nature and impact of the behaviour, alongside any known vulnerabilities, previous concerns or wider patterns of behaviour, when determining the appropriate safeguarding response.

Child protection is those measures that are put into place once a learner, aged under 18, has been identified as at risk of or has suffered significant harm, with the objective of protecting that individual from further risk or actual harm. As an Independent Training Provider, the College does not operate within the statutory Children Missing Education (CME) framework that applies to schools; instead, safeguarding risk arising from attendance, absence and disengagement is managed through the College's own attendance monitoring and safeguarding procedures, informed by the principles set out in Keeping Children Safe in Education (KCSIE) 2025. The College will monitor attendance closely and take prompt action in response to unexplained or persistent absence, or disengagement from learning. This includes identifying potential safeguarding risks such as exploitation, neglect, or disengagement from education, and escalating concerns in line with safeguarding procedures.

The College recognises the importance of understanding the voice and lived experience of the learner. Safeguarding decisions will take into account the wishes, feelings, and experiences of the learner, ensuring they are supported and involved in decisions that affect them, where appropriate.

3.3 Prevent and the Channel referral process

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. The College fulfils its statutory responsibilities by ensuring that all staff recognise that protecting young people from extremism and radicalisation is a key plank of our safeguarding duties.

PREVENT refers to specific elements of the Government's overarching Anti-Terrorist strategy defined under section 26 (10 of the Counter Terrorism and Security Act 2015) as part of CONTEST and includes appropriate references to

Channel and other measures.

The College ensures that learners are taught to recognise the dangers posed by the activities of extremist groups and to understand how to recognise and protect themselves from the activities of those seeking to radicalise vulnerable young people.

Some concerns which are identified around incidents of potential extremist behaviours will have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations where concerns are raised around individuals at risk of being drawn into violent extremism.

PREVENT officers from the relevant Police Force will carry out an initial assessment and, if appropriate, set up a multi agency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, other appropriate and targeted support will be considered for the individual.

This system, the CHANNEL process, is utilised by the College to provide learners with access to a confidential and voluntary process where support options can be offered.

3.4 Extremism

Extremism is defined by Government as 'the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results in (1) or (2).

3.5 Core British Values also referred to as Fundamental British Values

British Values are defined as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance for those with different faiths and beliefs.

All College staff will receive training and support to ensure that they have sufficient knowledge of British Values, Prevent and radicalisation and exemplify British Values in their work and in their general behaviours. The College's own values embody the British Value of 'mutual respect and tolerance' as they include commitments to being inclusive, fair to everyone and showing respect to one another.

3.6 Abuse and neglect (defined by the Department of Health)

Abuse and neglect is "...a violation of an individual's human and civil rights by any other person or persons." This definition is provided by the Department of Health.

The early identification of abuse and neglect is vital and all staff should be aware that safeguarding issues are rarely 'stand alone' events that can be covered by one definition or label. If staff are unsure they should always speak to a designated safeguarding lead.

All staff should be aware that safeguarding incidents and/or behaviours can occur between learners outside the

learning environment, including online and can be associated with external factors. These include factors outside the familial setting and learners can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

3.7 Female genital mutilation (FGM)

Female genital mutilation refers to all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs, for non-medical reasons. It is recognised internationally as a serious violation of the human rights of girls and women. All staff should speak to a DSL with regard to any concerns about female genital mutilation. There is however a specific legal duty on teachers regarding such cases. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

3.8 Types and indicators of abuse and neglect

Learners aged up to 18

Abuse is a form of maltreatment of a child or young person, may constitute a single act or a series of repeated actions or by failing to prevent harm. Abuse may be in a family, institutional or community setting, or online by those known to them or by others, including adults, young people or children.

KCSIE advocates the use by staff of 'professional curiosity' and reinforces that staff should speak to a DSL if they have concerns about a child. Staff are expected to demonstrate professional curiosity at all times. This means they should:

- Ask appropriate questions to better understand concerns
- Notice patterns, changes, or inconsistencies in behaviour or presentation
- Follow up on low-level or emerging concerns
- Challenge assumptions where necessary

Staff must not accept explanations at face value where there are safeguarding concerns and should always seek advice from a DSL if unsure.

KCSIE 2026 states 'all staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened.'

Staff and learner relationships are discussed in KCSIE 'It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.' The College staff, not only those with a dedicated pastoral role, are committed to fostering positive relationships with learners to create safe learning environments and to build mutual trust and respect.

Abuse may take various forms and specific types of abuse are explored in more detail in the section which follows. The list is not exhaustive but indicative of the range of abuse that can be experienced and which is within the scope of safeguarding and Prevent:

- Physical abuse; physical injury/violence, including bullying.
- Emotional abuse; the persistent emotional maltreatment of a child or young person including bullying via cyberbullying and harassment as well as exploitation and corruption.
- Sexual abuse; where an individual is forced to enter into a sexual activities without their consent, or where

they are unable to consent. Sexual abuse can take place online and technology can be used to facilitate offline abuse.

- Sexual violence and sexual harassment in college or in the community.
- Child on child abuse - defined as including, but not limited to:
    - Physical abuse
    - Abuse in intimate personal relationships between children, sometimes known as teenage relationship abuse
    - Sexual harassment and violence
    - Causing someone to engage in sexual activity without consent
    - Consensual and non-consensual sharing of nude and semi-nude images and/or videos
    - Upskirting
    - Initiation/hazing
    - Bullying
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where there is an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
- Risk of serious crime or serious violent crime (including 'county lines' activity). This includes recognition of the College's responsibilities under the Serious Violence Duty, as set out in the Police, Crime, Sentencing and Courts Act 2022, to work with local partners to prevent and reduce serious violence.
- Hazing (challenges or humiliation resulting in psychological or physical abuse).
- Radicalisation and/or extremism behaviour.
- Financial abuse, where an individual is forced to part with money against their will, or money is systematically taken from them without their consent.
- Modern slavery.
- Neglect; the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of development. This includes the failure to act when action is needed.
- Upskirting; The Voyeurism (Offences) Act, which is commonly known as the Up skirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim;
- Online Abuse; this can be linked to emotional abuse, bullying or sexual abuse outlined above. ● Substance misuse.
- Racist, disability, homophobic or transphobic abuse.
- Honour based violence (including forced marriage); Since February 2023, marriage under the age of 18 is illegal.
- Issues that may be specific to a local area or population, for example gang activity and youth violence.

Any other issues not listed here but that pose a risk to children, young people and adults at risk. Abuse can be carried out by anyone, it may be related to an imbalance of power, be linked to personal or family relationships, cultural or religious background or child on child activities.

The college recognises that young LGBTQ+ learners may be more at risk of abuse than others and aims to focus on prevention education for all learners to help prepare them for life in 'modern Britain'. The college recognises that these learners may have disproportionate vulnerabilities and is committed to a zero tolerance culture of 'sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment'.

Risks Specific to Apprenticeship Provision

The College recognises that apprentices may be exposed to additional safeguarding risks due to the nature of workplace learning. These include:

- Lone Working
    - Apprentices working alone without direct supervision
    - Increased vulnerability due to isolation from peers and support networks
- Travel to and from Workplaces
    - Risks associated with travelling alone, particularly at unsociable hours
    - Potential exposure to unsafe environments or individuals
- Working with Adults in Industry
    - Power imbalances between apprentices (particularly those under 18) and adult colleagues
    - Risk of inappropriate behaviour, exploitation, harassment, or coercion
    - Blurred professional boundaries in informal workplace cultures
- The College mitigates these risks through:
    - Employer vetting and safeguarding checks
    - Clear codes of conduct
    - Regular progress reviews with apprentices
    - Ongoing safeguarding training for staff and employers

Learners aged 18+

- Physical abuse; this includes assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Domestic violence and abuse; this includes psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence and abuse.
- Sexual abuse; this includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- Psychological abuse; this includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- Financial or material abuse; this includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- Modern slavery; this encompasses slavery, human trafficking, forced labour and domestic servitude.
- Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- Discriminatory abuse; this includes forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- Organisational abuse; this includes neglect and poor care practice within an institution or specific carer setting such as a hospital or care home, for example, or in relation to care provided in one's own home.
- This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- Neglect and acts of omission; this includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Self-neglect: this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

3.9 Sexual violence and sexual harassment

The College has a zero tolerance policy on sexual violence and sexual harassment in whatever form including online and social media, such as 'sexting' and the sharing of unsolicited images. The College actively works to minimise the risk of child on child abuse by ensuring that all learners are aware that there is a zero-tolerance approach to abuse. In no circumstances is it ever acceptable for sexual violence and sexual harassment to be passed off as 'just banter' or 'just having a laugh'. The College is committed to countering any culture of unacceptable behaviours and an unsafe environment to learners.

The College is committed to supporting learners who experience any form of sexual violence or sexual harassment including online abuse. All staff are sensitive to the needs of victims and respect their right to be taken seriously. In line with KCSIE victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment'. The focus is to ensure that learners understand that the law on child on child abuse is there to protect them rather than criminalise them.

The College recognises the importance of 'intra-familial harms, and any necessary support for siblings following incidents', along with the need to be a part of discussions with statutory safeguarding partners. As part of our safeguarding duties, the College ensures that learners are made aware that some forms of online activity such as consensual sharing of nudes, or semi-nudes and videos are not 'abusive' but are in fact illegal.

The College recognises that teaching young people about safeguarding issues can prevent harm by providing them with the skills, attributes and knowledge they need to identify risks, including those encountered online and to access help when they need it. In no circumstances is it ever acceptable for abuse to be passed off as 'just banter' or 'just having a laugh'. The College is committed to countering any culture of unacceptable behaviours and an unsafe environment to learners.

Risks of child on child abuse, including sexual violence and sexual harassment, are minimised by ensuring that all members of staff are alert to any signs of it and are confident in challenging unacceptable behaviour immediately and following the college's processes. In line with KCSIE, both victim and perpetrator and any others involved including parents/carers are well supported.

In the case of online abuse, the advice of the UK Council for Internet Safety (UKCIS 2020) is followed by safeguarding teams in the College in supporting learners from the risks and in managing incidents.

3.10 Mental health

All staff should be aware that mental health problems can be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

We recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are however well placed to observe learners' behaviour and identify those who may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a young person that is also a safeguarding concern, immediate action should be taken using the College's reporting procedures which include routes to escalate and clear referral systems.

The College approach to support, includes seeking to help learners to build their resilience and know how to access appropriate support. The College recognises that not everyone with a mental health problem will feel suicidal and not everyone who has thoughts of suicide has a mental health problem. Staff should be familiar with the The College Suicide Prevention and Responding to the Death of a Learner Protocols.

3.11 Childhood and domestic abuse and neglect

Where children and young adults have suffered abuse and neglect, or other potentially traumatic adverse 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.

It should be noted that children and young people can also be adversely affected by witnessing domestic abuse in

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

Domestic abuse is included within the list of safeguarding issues, in KCSIE, that all staff should be aware of. The guidance makes it clear that domestic abuse can:

- Be psychological, physical, sexual, financial, or emotional
- Impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

There is also a reminder to all staff in KCSIE that 'children may not feel ready or may not know how to tell someone they are being abused/neglected. They also might not be able to identify their experiences are harmful'. Fostering good relationships with learners built on trust and respect will help the College staff to recognise signs that there may be underlying problems and to offer sensitive support when the learner feels ready to share any concerns.

Experiencing domestic abuse has been defined as an 'Adverse Childhood Experience' and the College recognises the impact of domestic abuse upon social, psychological, physical, emotional and behavioural outcomes. These often impact negatively upon a child's academic success. Early access to appropriate support, depending on the wishes of the child, can help to reduce the more damaging effects of some impacts and to help the child to achieve the best future academic outcomes.

3.12 Vulnerable learners

Following a learner's application to study at the College, and during the admissions and interview process, any vulnerabilities or additional support needs will be identified. These factors may indicate that a learner is more likely to experience harm, abuse, exploitation, barriers to engagement or difficulties accessing education and support.

Vulnerabilities or circumstances that may require additional consideration include, but are not limited to:

- Special educational needs and disabilities (SEND), including communication or other barriers that may affect a learner's ability to understand information, communicate concerns, recognise abuse or seek help;
- Medical conditions, including physical or mental health conditions that may affect a learner's wellbeing, safety, attendance or ability to engage with education;
- Learners who are in care, care leavers, or who have an allocated social worker;
- Learners who are electively home educated;
- Young carers, where caring responsibilities may affect their wellbeing, attendance, participation or ability to access support;
- Learners who have experienced or are at increased risk of bullying, harassment or discrimination, including where their vulnerability may result in disproportionate exposure to such experiences;
- Ex-offenders;
- Adults experiencing financial hardship or who may be at risk of financial exploitation;
- Adults living independently for the first time or living in unstable or insecure housing;
- Adults at risk of coercion, controlling relationships or other forms of exploitation; and
- Learners with limited support networks, social isolation or other circumstances that may increase their vulnerability.

Where vulnerabilities or additional support needs are identified, the College will consider whether reasonable adjustments, additional support or alternative communication approaches are required to enable the learner to participate fully in College life and to access information, safeguarding processes and support.

Where appropriate, an Additional Support Review may be arranged to ensure that vulnerabilities and support needs are appropriately identified, that reasonable adjustments are considered and implemented where required, and that appropriate support is planned to help the learner engage safely and effectively with the College.

Vulnerability will be considered on an individual basis, recognising that learners may have multiple or intersecting vulnerabilities. The identification of a vulnerability will not, in itself, be regarded as an indication that a learner is at risk of harm; rather, it will prompt appropriate consideration of the learner's individual circumstances, support needs and any additional safeguarding measures that may be required.

3.13 Child on Child Violence

The College recognises that child-on-child abuse, including harmful sexual behaviour, sexual harassment, sexual violence and other harmful or inappropriate behaviour is a significant safeguarding risk within Further Education (FE) colleges and Independent Training Providers (ITPs). This reflects the diverse age range of learners, mixed-status cohorts (under 16, 16–18, and 18+), workplace and apprenticeship environments, and extensive use of digital platforms.

child-on-child abuse, including harmful sexual behaviour, sexual harassment, sexual violence and other harmful or inappropriate behaviour refers to behaviour where a child or young person causes harm to another child or young person. It can occur on-site, off-site, in work placements, employer premises, transport, social spaces, or online. It may involve a single incident or a pattern of behaviour and can be physical, emotional, sexual, psychological, financial, or coercive in nature.

Within FE colleges and ITP provision, child-on-child abuse, including harmful sexual behaviour, sexual harassment, sexual violence and other harmful or inappropriate behaviour may present through:

- Physical assaults, intimidation, or threats between learners
- Sexual violence or sexual harassment, including unwanted touching, comments, gestures, or online abuse
- Bullying and harassment, including sexist, misogynistic, homophobic, transphobic, racist, or disability-related behaviour
- Abuse within peer or intimate relationships, including controlling or coercive behaviour
- Initiation or hazing activities linked to peer groups, courses, or informal hierarchies
- Exploitation dynamics arising from power imbalances linked to age, confidence, disability, gender, social status, or placement context
- Online harms, including image-based abuse, non-consensual sharing of images, threats, or harassment via social media, gaming, or messaging platforms
- Incidents occurring in apprenticeship or workplace learning environments involving other learners or young people

College Approach

The College adopts a contextual safeguarding approach, recognising that harmful peer behaviour is influenced by wider social, digital, and environmental factors.The College recognises that harm can occur outside the home (extra-familial harm), including within peer groups, online environments, and workplace settings such as apprenticeships. Safeguarding responses will consider:

- The safety, wellbeing, and wishes of the victim
- The age, development, understanding, and vulnerabilities of all learners involved
- Power imbalances, coercion, and contextual influences, including online and workplace settings

- Whether behaviour is developmentally inappropriate, abusive, or potentially criminal

The College maintains a zero-tolerance approach to child-on-child abuse. Such behaviour is never dismissed as "banter", "initiation", or a normal part of growing up.

Responding to Child-on-Child abuse

All concerns relating to child-on-child violence will be:

- Reported and recorded through the College safeguarding reporting system
- Assessed by a DSL to determine risk and appropriate action
- Managed in a way that prioritises the protection and ongoing safety of the victim
- Addressed with proportionate support for alleged perpetrators, recognising that they may also present safeguarding needs

Where thresholds are met, referrals will be made to relevant external agencies, including Children's Social Care, Police, or specialist support services. Where incidents relate to apprenticeships or work placements, employers and placement providers will be engaged appropriately, in line with information-sharing and safeguarding protocols.

Prevention and Education

The College is committed to preventing child-on-child violence through a whole-organisation approach, including:

- Clear expectations of behaviour communicated at induction and through learner policies
- Curriculum and tutorial content that promotes respectful relationships, consent, boundaries, and equality
- Education on online safety, peer influence, and reporting concerns
- Regular staff training focused on recognising, challenging, and responding to child-on-child violence within FE and ITP settings

4. Online safety

We believe that young people should never experience online abuse of any kind. They should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe. The College is committed not only to preventing online harm but also to educating learners to engage safely, critically, and responsibly online

The College is committed to developing a whole organisation approach to online safety which effectively empowers it to protect learners and staff in their use of technology. Staff are not expected to be experts in emerging technologies or AI. They are expected to recognise potential safeguarding concerns, exercise professional curiosity and report concerns promptly through the organisation's safeguarding procedures.

As detailed within KCSIE, many learners may have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means that some children, whilst at college, may sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

The College reinforces positive behaviour standards and has a zero tolerance approach to instances of online abuse which features strongly in induction of all. A web filtering and monitoring system is in use to filter and monitor online activity. The system (Securly) also detects keywords associated with adult content, radicalisation, violence, cyberbullying, illegal content and hate or discriminatory content relating to protected or vulnerable groups, including

race, ethnicity, religion or belief, sexual orientation and gender identity, on devices accessing the College network.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas:

- Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, 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: 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.

The security of the College's information systems, including filtering and monitoring arrangements, will be reviewed and updated as appropriate.

The lead responsibility for filtering and monitoring systems is held by the National DSLs and, in line with KCSIE, this responsibility is explicit in their job descriptions.

The Board has strategic oversight of filtering and monitoring systems and will regularly review their effectiveness to ensure they are appropriate, proportionate and in line with statutory guidance.

The College will ensure that filtering and monitoring systems are reviewed at least annually, and following any significant change to technology, systems, identified safeguarding risks or relevant statutory guidance.

4.1 We recognise that

- The online world provides everyone with many opportunities; however it can also present risks and challenges.
- The increased use of social media platforms by young people has heightened the vulnerabilities and risks faced by learners.
- The College has a duty to ensure that all young people and adults involved in our organisation are protected from potential harm online. All learners, regardless of age, disability, gender identity, race, religion, or sexual orientation, have the right to protection and support in navigating online spaces safely.
- The College has a responsibility to help keep young people safe online, whether or not they are using College's network and devices.
- All learners, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- Working in partnership with young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety.

4.2 How we will seek to keep people safe from online harm

- Updating this policy as required, for approval by the chair of the Safeguarding and Prevent Committee and the Executive Leadership Team.
- Complying with the new published standards for 'Filtering and Monitoring', ensuring that all staff are adequately trained and understand their role in this.
- Providing clear and specific directions to staff and volunteers on how to behave online through our staff code of conduct.

- Regularly review emerging technologies and social media trends to identify potential risks and ensure safeguarding measures remain proactive and up to date.
- Providing clear guidance on the appropriate use of social media platforms or hubs associated with the College.
- Advising parents and carers of the systems that are in place to filter and monitor online use.
- Utilising tutorials, literature and posters to educate young people on identifying potential online safeguarding risks, measures for protecting themselves from these risks, and expected behaviours to protect others.
- Acceptable learner behaviour is enforced by the Learner Disciplinary Policy and Procedures.
- Ensuring our filtering and monitoring procedures also apply to the use of generative artificial intelligence (AI). The College will monitor AI use in classrooms and learning environments to ensure it is safe, appropriate, and aligned with our safeguarding principles, including addressing risks such as deepfakes, AI-generated sexual abuse material, and other harmful or misleading content.
- Providing ongoing discussions with learners about; healthy relationships, abuse and consent, where to go for help and how to report unacceptable activity or behaviour.
- Providing an online safety agreement for use with young people, which all learners must agree to at the start of their studies to develop practices to support and encourage online safety.
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or young person.
- Ensuring that usernames, logins, email accounts and passwords are used effectively.
- Ensuring personal information about the staff and learners who are involved in the College is held securely and shared only as appropriate.
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given.
- Providing supervision, support and training for staff and volunteers about online safety.
- Examining and risk assessing any social media platforms and new technologies before they are used within the College.

4.3 If online abuse occurs, we will respond to it by

- Having clear and robust safeguarding procedures in place for responding to abuse (including online abuse).
- Providing support and training for all staff and volunteers on dealing with all forms of abuse, including; bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation.
- Our response prioritises the safety and wellbeing of those affected, including witnesses.
- Reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.
- Ensuring that our safeguarding teams manage all cases of suspected or alleged online abuse in line with the principles clearly defined by the UK Council for Internet Safety in their guidance UKCIS guidance.

4.4 Responding to cases linked to sexting, sexual abuse and sexual exploitation

Sending and sharing ‘nudes and semi nudes’ is one of a number of ‘risk-taking’ behaviours associated with the use of digital devices, social media or the internet, including the sending or posting of nude or semi-nude images, videos or live streams by young people under 18 online. Methods of sharing nudes or semi nudes could be by social media, gaming platforms, chat apps or forums, as well as including sharing between devices.

Nudes, or semi nudes may be sent for various reasons, such as being shared by young people who are in relationship and those not in a relationship, a young person may be coerced into sharing an image, young people may find nudes, or semi nudes online and share them and nude or semi nude images may be digitally manipulated.

The College takes a proactive approach to help learners understand, assess, manage, and avoid the risks associated with online activity, recognising its duty of care to support learners who may become involved in such activity and to report behaviours that cross legal or safeguarding boundaries. Our priority is to educate learners about activities that are illegal and, through this education, help to prevent and eliminate such behaviours.

The College follows the guidance provided by the NSPCC for professionals in supporting young people to report nudes shared online using the 'Report Remove' tool.

There are many different levels of inappropriate 'nudes and semi-nudes' and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. However, it is important that the College applies a consistent approach when dealing with an incident to help protect young people and the organisation.

For this reason, any such case is reported as a safeguarding concern and given immediate attention. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response.

The College is committed to supporting learners who experience any form of sexual abuse including online abuse, sexual violence and sexual harassment. All staff are sensitive to the needs of victims and respect their right to be taken seriously. In line with KCSIE, victims are to be 'kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment'. The focus is to ensure that learners understand that the law on child on child abuse is there to protect them rather than criminalise them.

Step	Action	Responsible Party	Notes
1	Identify: Report or notice that a nude/semi-nude image has been shared	Any staff member or learner	Initial report can come from learners, staff, or external sources
2	Assess: Determine risk level and context	DSLs	Consider age, consent, coercion, and potential harm
3	Contain: Prevent further sharing	DSLs & IT	Remove content from platforms where possible, secure devices
4	Support: Provide support to affected learner(s)	Any member of staff	Emotional support, guidance, and signposting to external services
5	Report: Escalate to appropriate authorities if required	DSLs	Police, Multi-Agency Safeguarding Hub (MASH), NSPCC 'Report Remove' tool

6	Investigate: Conduct internal review	DSLs	Follow consistent procedures, document actions
7	Educate & Prevent: Review incident and provide learning opportunities	DSLs / Tutors	Use the incident to educate learners on safe online behaviour

4.5 Legal Framework for Online Safety

The College recognises that effective safeguarding depends on timely information sharing. Staff should not allow concerns about data protection to prevent the sharing of information where there is a safeguarding risk. The College recognises that effective safeguarding depends on timely and appropriate information sharing. Staff should not allow concerns about data protection to prevent appropriate information sharing where there is a safeguarding risk.

Key Legislation Summary:

Area	Relevant Law / Guidance	Key Points
Online abuse / harassment	Malicious Communications Act 1988; Communications Act 2003	Covers sending offensive, threatening, or false messages online
Indecent images / nudes	Protection of Children Act 1978; Sexual Offences Act 2003	Making, possessing, or distributing indecent images of anyone under 18 is illegal
Sexual harassment / exploitation	Sexual Offences Act 2003; KCSIE 2026	Covers sexual abuse, harassment, grooming, and exploitation
Stalking / harassment	Protection from Harassment Act 1997	Includes repeated unwanted communications or behaviour causing alarm or distress
Fraud / online scams	Fraud Act 2006; Computer Misuse Act 1990	Covers phishing, financial scams, hacking, and other online criminal activity
Safeguarding guidance	UKCIS, NSPCC, DfE Digital & Technology Standards (2023)	Provides professional guidance for responding to online risks and safeguarding young people

Data Protection Note:

All filtering and monitoring activities are conducted in line with UK GDPR, ensuring personal information is processed

lawfully, securely, and only for safeguarding purposes. Staff are trained to handle personal data appropriately, and any monitoring of online activity is proportionate, transparent, and documented.

Legal Considerations Regarding Sharing Nudes / Semi-Nudes

Relevant offences include:

- Stalking
- Harassment
- Improper use of a public communications network
- Sending indecent, offensive, false or threatening communications
- Sending private sexual photos or videos of another person without their consent.

The UKCIS guidance "Sharing Nudes and Semi-Nudes", produced in consultation with the National Police Chiefs Council (NPCC), highlights that responding to incidents involving nudes or semi-nudes is legally complex. Key points include:

- Making, possessing, or distributing indecent imagery of anyone under 18 is illegal, including images taken by the young person themselves.
- The law was not intended to criminalise children and young people. It predates the rise of digital devices and social media.
- The focus should always be on safeguarding rather than punishment, to avoid stigma or discrimination affecting future education, employment, or adulthood.
- The police may need to be involved for investigation, evidence collection, or in cases with abusive/aggravating factors. Incidents should be referred through the Multi-Agency Safeguarding Hub (MASH) or equivalent.
- The College's responsibility is to refer incidents appropriately, not to decide the seriousness of the matter. That decision lies with the police and the CPS.

In summary, sharing nudes or semi-nudes is classed as illegal because it constitutes the sharing and/or possession of an indecent image of a child.

This policy also aligns with the DfE's "Meeting Digital and Technology Standards in Schools and Colleges" (2023) and statutory filtering and monitoring requirements, ensuring that our systems meet current national standards for safeguarding online activity.

4.6 Mobile technology

The organisation recognises that mobile phones and other personal devices can present safeguarding and online safety risks, including inappropriate communication, access to harmful content, recording or sharing of images or information without consent, cyberbullying, harassment and other forms of online harm.

The organisation manages the use of mobile phones and other personal technology in accordance with its Mobile Phone Policy, taking account of the needs of its learners, the delivery environment and the nature of the provision. In teaching and learning environments, mobile phone use is not permitted unless specifically authorised by the teacher or tutor for an identified learning, accessibility or other appropriate purpose.

The organisation will apply a proportionate and risk-based approach to the management of mobile technology. This will take account of differences between centre-based learning, apprenticeships, industry placements and workplace-based provision, where expectations and practical arrangements may differ.

Where mobile technology is used inappropriately or contributes to a safeguarding concern, this will be managed in accordance with the organisation's safeguarding, behaviour and online safety procedures. Staff should report safeguarding concerns involving mobile technology through the normal safeguarding reporting arrangements.

The organisation manages the use of mobile phones and personal devices in accordance with its Mobile Phone Policy. In teaching and learning environments, mobile phone use is not permitted unless specifically authorised by the teacher or tutor for an appropriate purpose. Where inappropriate use of a mobile phone or personal device gives rise to a safeguarding concern, this will be managed in accordance with the organisation's safeguarding procedures.

5. Allegations against staff, including supply staff and volunteers

Any safeguarding concern or allegation made about a member of staff, including agency or supply staff, trainees, volunteers and contractors, will be managed in accordance with Part 4 of KCSIE 2026 and the College's safeguarding procedures.

All safeguarding concerns and allegations, including low-level concerns, must be reported without delay in accordance with the College's reporting procedures. Concerns relating to staff, agency or supply staff, trainees, volunteers or contractors must be reported to the appropriate line manager, DSL or senior leader and, where appropriate, to the Director of People Services or other senior People Services Manager authorised to deputise in such matters, who will liaise with the Head of Safeguarding. An initial assessment of the allegation is made in consultation with the relevant Local Authority Designated Officer (LADO).

When dealing with allegations, consideration of the harm thresholds as detailed in KCSIE will be applied. These specify whether the individual 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 they may pose a risk of harm; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

5.1 Immediate Actions (Within the Same Working Day)

These procedures apply where the concern relates to any member of staff, agency or supply worker, trainee, volunteer or contractor.

- Ensure the immediate safety and wellbeing of the student(s) involved
- Report the concern immediately to their line manager, DSL, or senior leader (no delay)
- Not investigate or question the individual concerned beyond establishing basic facts
- Make a factual written record of the concern as soon as possible, including dates, times, and exact wording where relevant
- Submit the concern via MyConcern
- Maintain strict confidentiality, sharing information only with those who need to know

The Director of People Services and Head of Safeguarding will:

- Consider whether the allegation meets the threshold for referral to the LADO
- Take advice from the LADO before any internal investigation begins

- Consider whether immediate risk management actions are required (e.g. redeployment, supervision, or suspension in line with HR procedures)

5.2 Actions Following an Allegation

Following the initial report and consultation with the LADO:

- A formal strategy discussion may take place with external agencies where required
- The College will follow LADO advice on next steps, including whether a police investigation or children's social care involvement is necessary
- HR procedures will be initiated where appropriate, ensuring a fair and proportionate process
- The member of staff will be informed of the allegation at an appropriate stage, in line with external agency advice
- The College will ensure appropriate support is provided to both the student(s) and the staff member involved
- All actions, decisions, and outcomes will be clearly recorded and retained in line with statutory guidance

The Director of People Services and Head of Safeguarding will ensure that low-level concerns are recorded and managed effectively in line with College expectations.

Where the Director of People Services or Head of Safeguarding is the subject of the allegation, the report must be made to the CEO, who will nominate a suitably trained senior manager to act in their place.

Where the CEO is the subject of the allegation, the report must be made to the Head of Safeguarding, who will liaise with the Board or a nominated representative.

The College Whistleblowing Policy will be accessible to all staff to enable concerns about unsafe practice or behaviour to be raised appropriately.

5.3 Low-Level Concerns

A low-level concern is any behaviour by a member of staff, agency or supply worker, trainee, volunteer or contractor which is inconsistent with the standards or values set out in the College's staff code of conduct or other relevant professional expectations, including inappropriate conduct outside of work, but which does not meet the harm threshold set out in KCSIE.

Examples of Low-Level Concerns
Examples may include, but are not limited to:

- Being over-familiar with students
- Use of inappropriate language or jokes
- Showing favouritism towards particular students
- Boundary issues in professional relationships
- Unprofessional conduct on social media or other online platforms

Reporting

All low-level concerns relating to staff, agency or supply workers, trainees, volunteers or contractors must be reported immediately to the Designated Safeguarding Lead (DSL) or a senior leader.

Recording and Response

- All low-level concerns will be recorded in MyConcern
- Concerns will be reviewed to identify patterns of behaviour
- Repeated or escalating concerns may result in referral to formal procedures

Accumulation of Low-Level Concerns

The College recognises that while a single low-level concern may not meet the harm threshold, the accumulation of multiple concerns over time may indicate an emerging safeguarding risk.

Where patterns are identified:

- Records will be reviewed collectively to assess frequency, context, and escalation
- The Designated Safeguarding Lead and Head of Safeguarding may initiate a multi-disciplinary review (e.g. HR, safeguarding, senior leadership)
- Consideration will be given to whether the combined concerns meet or are approaching the LADO threshold
- Proportionate action may be taken, including:
    - Increased supervision or management oversight
    - Formal management action or HR processes
    - Escalation to LADO where risk thresholds are met or ambiguity exists

This ensures that early warning signs are not overlooked and that safeguarding responses are proactive rather than reactive.

Confidentiality

Information relating to low level concerns will be handled sensitively and shared on a strictly need-to-know basis to ensure appropriate safeguarding and staff support.

6. Related policies and procedures

This policy statement should be read alongside our organisational policies (which can be found on our Policy Portal) and procedures (which can be found on the ACC Quality Landing Page) including:

- Disciplinary and Conduct Policy
- Safer Recruitment Policy
- Learner Behaviour and Support Policy
- Equality and Diversity policy
- Conflict of Interest and Personal Relationships Policy
- Whistleblowing Policy
- Data Protection Policy
- Anti Bullying Policy

This list is not exhaustive For more information, please contact your line manager or the Head Safeguarding.

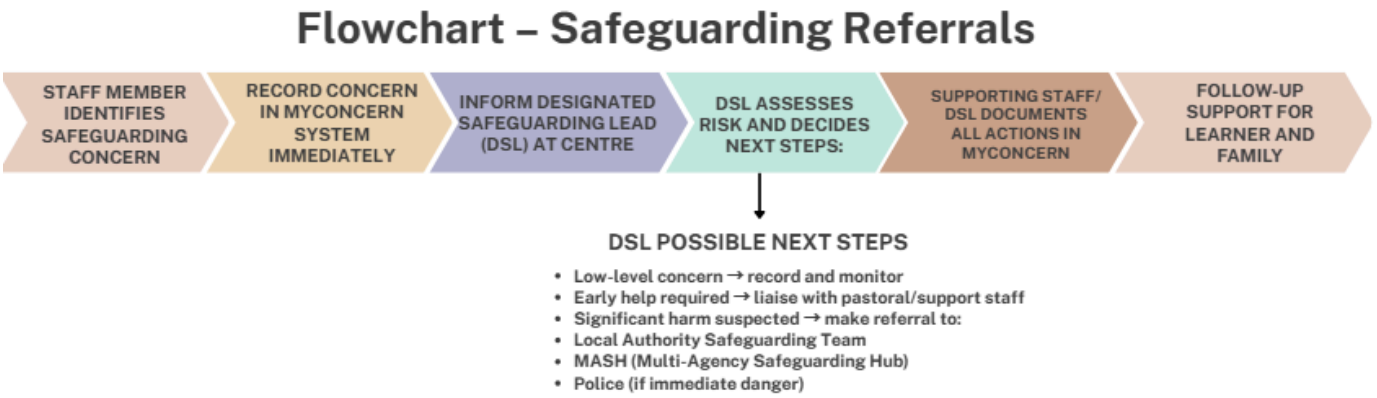
7. Appendices

7.1 Appendix 1 - Safeguarding referral flowchart

The College provides clear safeguarding reporting procedures through its referral flowcharts.

A specific safeguarding reporting flowchart for apprenticeship and workplace settings is included to support staff, employers and apprentices. This flowchart outlines the process for reporting concerns arising in employer settings, including escalation routes between employers, Industry Practitioners (IPs), and Designated Safeguarding Leads (DSLs).

The flowchart should be followed by all staff when responding to safeguarding concerns and must be used alongside the College's safeguarding reporting system.



7.2 Appendix 2 - Summary of key safeguarding contacts for each centre

DSL Contact information- Contact information for DSLs.

ational DSL Support	
Chelsea Evans - Head of Safeguarding	Chelsea.evans@accesscreative.ac.uk 07345740317
Lesley Hurst - Safeguarding Manager	Lesley.hurst@accesscreative.ac.uk

Key Safeguarding contacts, to include:

- Children's Social Care / Local Authority Front Door / Family Help
  - The relevant local authority's arrangements should be followed when making safeguarding referrals. Contact details, referral pathways and thresholds will vary between local authority areas. Staff should refer to the local safeguarding contacts provided for the area in which the child or young person is located and seek advice from the DSL where required.
- LADO (Local Authority Designated Officer)
  - The LADO deals with allegations against adults who work with children (teachers, volunteers, carers, etc.).
- Prevent Coordinator
  - Part of the government's Prevent Duty. The Prevent Coordinator works on safeguarding children and

vulnerable people from the risks of radicalisation and extremism.

7.3 Appendix 3 - Version control table showing policy changes by review cycle

Version	Date Approved	Changes Made	Approved By
1.0	Aug 2024	Initial full policy	COO
1.1	Aug 2025	Added CME reference, Serious Violence Duty, updated online safety standards, expanded vulnerable learners section, added AI-generated material risk, updated Prevent training, added appendices flowchart & contacts	CEO
1.2	April 2026	• Change KCSIE legislation to 2025 from 2024 • Job roles change Head of Safeguarding and Student support to Head of Safeguarding. • Added Safeguarding Manager details. • Changes to what the college defines as safeguarding. • Change a clinical commissioning group, to Integrated Care Board (ICB. • Added statements around with other and local safeguarding arrangements. • Added statement around attendance and monitor closing and taking print action in regard to unexplained and persistent absence. • Added definition and scope of early help. • Strengthened college college responsibility to sharing information and not not let data protection prevent sharing information when there is a safeguarding risk. • 2.2 Safeguarding in Apprenticeship and Workplace Settings • 2.3 Workplace Reporting Procedure • Risks Specific to Apprenticeship Provision	PSSLT
1.3	Aug 2026	Change KCSIE legislation to 2026 from 2025	

7.4 Appendix 4 - Relevant Acts and legislation (Online Safety)

- Computer Misuse Act 1990
- Data Protection Act 2018 & The General Data Protection Regulation (GDPR) (2018)
- Malicious Communication Act 1998
- Counter-Terrorism and Security Act 2015
- The Education Act 2002 - Section 157 & 175
- Working Together to Safeguard Children (HM Government, 2023, updated 2026)
- The Mental Capacity Act (2005)
- Equality Act (2010)
- Prevent Duty Guidance for England and Wales (2023)
- Modern Slavery Act (2015)

Summaries of the key legislation and guidance are available on:

- Online abuse learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse
- Bullying learning.nspcc.org.uk/child-abuse-and-neglect/bullying
- Child protection learning.nspcc.org.uk/child-protection-system

- Statutory guidance for schools and colleges on safeguarding children and safer recruitment Keeping Children Safe in Education (KCSIE) 2026

7.5 Appendix 5 - Online Safety: Other sources of guidance:

General guidance

- Teaching Online Safety in Schools (DfE publication) – includes information useful for support and intervention by post-16 providers.
- Impero Online Safety Handbook – a best practice deployment guide and resource pack for Senior Leadership Teams.

UK Safer Internet Centre

A partnership between Childnet International, Internet Watch Foundation and SWGfL to promote the safe and responsible use of technology for young people. Resources include:

- 360 Degree Safe – a free self-review tool for schools to assess their wider online safety policy and practice.
- Helpline – supports those working with children across the UK on online safety issues. Operated by SWGfL: 0344 381 4772 / helpline@saferinternet.org.uk
- Safer Internet Day – an annual UK event with materials (assemblies, lesson plans, posters, quizzes) for each Key Stage on a key online safety issue.

UK Council for Internet Safety

Expands on the former UK Council for Child Internet Safety, aiming for a safer online experience for all users, particularly groups who suffer disproportionate harms. Resources include:

- Education for a Connected World – a framework describing the digital knowledge and skills children and young people should develop at different ages and stages, covering current technology, its influence on behaviour and development, and the skills needed to navigate it.
- Age-specific advice on potential harms and risks, covering:
    - Online relationships
    - Privacy and security
    - Online reputation
    - Online bullying
    - Self-image and identity
    - Health, wellbeing and lifestyle

Other organisations (schools and general use)

- CEOP Thinkuknow Programme – the National Crime Agency's CEOP Education team, working to help protect children and young people from online child sexual abuse.
- UK Chief Medical Officers' Advice – for parents and carers on children's and young people's screen and social media use (published February 2019).
- The Anti-Bullying Alliance – a coalition of organisations and individuals working to stop bullying and create safer environments; offers tools and resources to prevent and tackle cyberbullying.
- Internet Matters – a not-for-profit empowering parents and carers to keep children safe online; includes a dedicated professionals' section with staff training resources, whole-school programmes and policies, and a parent pack.
- Internet Watch Foundation – an internet hotline for the public and IT professionals to report potentially criminal online content, including child sexual abuse images.
- NSPCC Learning – safeguarding and child protection teaching resources, advice and training for schools and colleges.

- PSHE Association – the national body for Personal, Social, Health and Economic (PSHE) education; its programme of study develops skills such as resilience, self-esteem, risk management, teamwork and critical thinking, alongside guides for teaching specific topics.
- SWGfL – a charity empowering safe and secure use of technology; free resources cover digital literacy, critical thinking, and the consequences of sharing and publishing images.
- Childline – information for pupils on sexting, gaming, grooming, bullying, porn and relationships.
- Get Safe Online – advice for young people about online abuse.
- Protect UK app – real-time information from Counter Terrorism (CT) Policing and the latest protective security advice.

For parents/carers

- Parent Zone – resources for families on the challenges of the digital age, including guides on the latest digital trends and platforms.
- Internet Matters – downloadable guides covering topics such as transition to secondary school, vlogging & live streaming, online gaming, and cyberbullying.
- NSPCC – Keeping Children Safe Online – resources to help parents keep children safe online, on social networks, apps and games.
- Thinkuknow – National Crime Agency guide for parents/carers of children and young people of all ages.
- UK Safer Internet Centre – advice for parents and carers.

7.6 Appendix 6 - Operating and staff guidance general advice

Staff and adults in education are well placed to notice possible signs of abuse, extremism or radicalisation in young people and adults at risk, due to their regular contact with them.

Signs of abuse, extremism or radicalisation may be obvious and sudden — for example, an injury or a specific action by the individual — or may form part of a wider picture over a longer period. This may include:

- Behaviour that is unusual for the individual, or for their age
- Work falling behind or a lack of interest
- Isolation or introversion
- An unexplained change in attendance levels, including learners who are "absent" from education
- Promotion or expression of extreme views, or a heightened interest in related information (electronic or physical), including websites, chat rooms, or repetition of extreme views expressed by others. This may include disclosures that approaches have been made to them or others they are aware of, or that pressure has been applied to accept views or doctrines that promote extremist behaviour, or to participate in such behaviour

What you should do

- Treat the matter seriously and reassure the individual if necessary
- React to what the individual tells you with belief
- Listen carefully to what is said, but avoid asking probing questions — only ask what is needed to clarify what is being said
- Make it clear that you will probably have to inform others
- Tell only those who need to know
- Seek advice if in doubt
- Keep a careful watch on the individual
- Record what you have noticed using the appropriate safeguarding reporting system, detailing what has happened and what action you have taken
- If there is an urgent or serious risk, or other cause for concern, ensure you also speak directly with the DSL or a manager — in addition to using the reporting system — so that immediate intervention can be made where

appropriate

What you should not do

- Do not promise to keep the matter secret or confidential, even if the individual asks you to
- Do not interrogate individuals or ask leading questions
- Do not contact Social Services or the Police yourself — contact a DSL in the first instance and use the appropriate reporting system
- Do not speak with anyone about whom allegations have been made

7.7 Appendix 7 - Reporting & analysis of data

Reports are generated monthly for the Safeguarding and Prevent Committee which meets half termly. The Committee is chaired by the Head of Safeguarding and in addition to meetings scheduled in advance throughout the year, extraordinary meetings are called in response to any radical changes with the potential to impact on safeguarding cases.

The College uses an industry-standard system, MyConcern, for the reporting and management of safeguarding and Prevent cases. This system enables reports to be generated which show levels and categories of concerns recorded by each part of The Group. Trends and associated issues are identified so that actions can be taken and interventions made. Chronological management of cases is monitored to ensure that all aspects of necessary follow up actions take place in respect of cases raised.

Regular reports with regard to Safeguarding and Prevent protection matters and incidents are regularly presented at the various board meetings across AFE.

The Board receives and reviews recommendations submitted and determines/approves any amendments to policies and procedures. The Board also notes the outcomes of any serious case reviews or reports from external bodies in determining appropriate arrangements to be implemented.

This aim is to ensure that areas of good practice or changes to policies, procedures and processes are identified and remedial action taken. This includes any liaison with relevant external bodies and agencies that is undertaken. At centre and partner level this data is reviewed in assessing the performance of learners identified as at risk.

The College will use safeguarding data and case reviews to identify trends, improve practice, and strengthen safeguarding systems. Learning from local and national safeguarding reviews will be embedded into policy and practice.

The College uses safeguarding data to:

- Identify trends and emerging risks
- Evaluate the effectiveness of interventions
- Inform staff training and curriculum development
- Improve safeguarding practice across all provisions

Senior leaders regularly review safeguarding data and take action where required.

7.8 Appendix 8 - Staff Recruitment & Training

Staff recruitment

- The College will employ staff recruitment and selection procedures (and other personnel management processes) that help to deter, reject, or identify individuals who might pose a risk of abuse against young people or adults at risk, or are otherwise unsuited to work with them. This includes those individuals identified as having a 'transferable risk'; a behaviour that may impact on their suitability to work with learners.
- The College will determine the level and type of DBS check required for each role based on the duties undertaken, the age of learners involved, and whether the role constitutes regulated activity. The College will apply the current DBS eligibility requirements and statutory guidance when assessing roles. Where a role involves regulated activity with children, the appropriate Enhanced DBS check with Children's Barred List information will be obtained where legally permitted and required.
- The College will review roles involving contact with children to determine whether the activities undertaken constitute regulated activity. From 1 September 2026, the removal of the supervision exemption will be taken into account when determining whether volunteers and other unpaid individuals are undertaking regulated activity with children. Where an individual is undertaking regulated activity, the College will ensure that the appropriate DBS and barred-list check is obtained before they undertake that activity, subject to the applicable legal requirements.
- The College maintains appropriate records of safer recruitment and pre-employment checks through its HR systems, in accordance with applicable legal and regulatory requirements.
- The College will ensure that these measures apply to any supply staff employed within the colleges.
- The College will also ensure that other appropriate pre-employment checks are in place including validation of identity, rights to work in the UK and employment history including the appropriate sourcing and receipt of references. Information regarding staff will be maintained on a regular basis and available via a Single Central Record from the Staff HR system.
- The College will employ learner recruitment and selection procedures that identify individuals who might pose a risk against young people or adults at risk.
- Individuals will be taken on a case by case basis.
- There will be an ongoing programme of training for relevant staff in protection issues and online.
- Training providing an introduction to safeguarding in the workplace will form part of the staff induction programme.
- Training will also be provided to relevant staff in respect of the PREVENT duty and the promotion of Core British Values through the curriculum and centre activities. Other training including Equality and Diversity, cultural awareness and risk assessment will also be provided with refresher training carried out on a regular basis. All staff will receive annual updates on online safety and safeguarding, in addition to refresher training as needed.
- The College will also ensure that a process is in place for measuring and evaluating the effectiveness and impact of training over time.
- Where the College provides educational and/or training opportunities for learners under 16 years of age, the relevant local centre DSL will liaise with the school and ensure that appropriate arrangements and protocols to safeguard children are agreed, put in place and monitored.
- Where vulnerable learners undertake work placements with the College, a designated person, under the direction of the Centre Manager will liaise with relevant representatives of the learner's host learning organisation or agencies to ensure that appropriate safeguards are put into place.
- Where learners from the College undertake work placements with external organisations, a designated person will liaise with relevant representatives of the host organisation or agencies to ensure that appropriate safeguards are put into place.
- Where vulnerable learners or those under the age of 16 engage with the College through participation in, attendance or performance at an external event, there will be a DSL in attendance.
- The College is committed to providing safe working and learning environments and will take appropriate action/measures to ensure the security of all premises and to control access.

These measures will aim to minimise the risk of access from dangerous intruders or persons deemed unsuitable to work with or support staff and/ or learners.

Staff training

- All staff will undertake initial safeguarding awareness training as part of induction processes on first

appointment and undertake periodic updating through a variety of methods, including online or e-learning, in-house training and briefings. All staff will also be required to read Part 1 of Keeping Children Safe in Education (KCSIE) and will be expected to familiarise themselves with the safeguarding responsibilities and procedures outlined within it.

- All staff receive refresher training including online safety training throughout the year as necessary to reflect changes and address training needs.
- All apprentices will receive safeguarding training as part of their induction and ongoing programme, which includes:
- Recognising safeguarding risks within workplace environments
- Understanding professional boundaries and appropriate conduct in industry settings
- How to report safeguarding concerns relating to employers, colleagues, or others in the workplace
- Awareness of Prevent risks within workplace settings, including recognising and responding to indicators of radicalisation
- This training will be reinforced through regular progress reviews and tutorial activity to ensure apprentices remain aware of safeguarding processes and feel confident in reporting concerns.
- All Group Designated Safeguarding Leads are trained to at least level 3 standard and also work closely with relevant local agencies. Refresher training is undertaken on a regular basis with certificated training being undertaken every 2 years.

7.9 Appendix 9 - Data Protection & UK GDPR

The College recognises that the welfare and safety of children, young people and adults is paramount. Data protection legislation and the UK GDPR do not prevent the lawful sharing of information for the purposes of safeguarding and promoting the welfare of children, young people and adults. Data protection law should not be used as a reason to withhold information where there is a lawful basis for sharing it to protect a child or adult from harm.

Lawful, proportionate and secure information sharing between education organisations, Children's and Adult Social Care, the police and other relevant agencies is essential to effective safeguarding and to ensuring that children, young people and adults receive the support they need. Information should be shared in accordance with the principles of data protection law, relevant safeguarding guidance and the College's data protection and information-sharing procedures.

7.10 Appendix 10 - Radicalisation - Vulnerability/risk indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable young people and adults experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a young person, adult or their family may be vulnerable or involved with extremism:

Vulnerability

Identity crisis: Distance from cultural/religious heritage and uncomfortable with their place in the society around them.

Personal crisis: Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from an existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.

Personal circumstances: Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

Unmet aspirations: Perceptions of injustice; feeling of failure; rejection of civic life. - Criminality: Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to extremist influences

- Reason to believe that the young person associates with those known to be involved in extremism.
- Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence.
- Use of closed network groups via electronic media for the purpose of extremist activity.

Experiences, behaviours and influencers

- Experience of peer, social, family or faith group rejection;
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour;
- Verbal or written support of terrorist attacks;
- First-hand experience of racial or religious hate crime;
- Extended periods of travel to international locations known to be associated with extremism;
- Evidence of fraudulent identity/use of documents to support this;
- Experience of disadvantage, discrimination or social exclusion;
- History of criminal activity;
- Pending a decision on their immigration/national status.

More critical risk factors include:

- Extremist recruiters;
- Articulating support for extremist causes or leaders;
- Accessing extremist websites, especially those with a social networking element;
- Possessing extremist literature;
- Justifying the use of violence to solve societal issues;
- Joining extremist organisations;
- Significant changes to appearance/behaviour

7.11 Appendix 11 - Modern Slavery & Human Trafficking

Modern Slavery & Human Trafficking

Modern Slavery and Human Trafficking are defined in the Modern Slavery Act 2015 as: Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the Act.

Slavery and Servitude Slavery

Slavery and Servitude Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: www.legislation.gov.uk/ukpga/2015/30/section/3/

For further information on modern slavery and the College's approach to tackling it, please refer to our Modern Slavery Policy.

7.12 Appendix 12 - Useful Support Contacts

Working Together to Safeguard Children (HM Government, 2023, updated 2026)
Provides statutory guidance on the roles and responsibilities of agencies working together to safeguard children and young people. It also sets out the framework for the multi-agency partnership approach to the coordination and management of safeguarding and child protection.

The Protection of Children Act 1999
It came into force in October 2000 and introduced the Protection of Children Act (PoCA) List, on which the Secretary of State has a duty to record the names of individuals considered unsuitable to work with children.

The Modern Slavery Act 2015
Information about modern slavery and human trafficking can be found at:
https://www.gov.uk/government/collections/modern-slavery-bill

Statutory Guidance
Keeping Children Safe in Education – September 2026
Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism

NSPCC (National Society for the Prevention of Cruelty to Children)
Helpline staffed by social workers offering support, information and advice for anyone concerned about child abuse. Guidance can be sought on a confidential basis.
Freephone: 0808 500 5000 (24/7)
nspcc.org.uk

Childline
Confidential helpline for children and young people who are in danger or have any type of problem.
Freephone: 0800 1111 (24/7)
childline.org.uk

Kooth
An online support service for children and young people.
kooth.com

Family Lives (previously Parentline)
Confidential information and support for parents facing problems in their families.
Freephone: 0808 800 2222 (24/7)
familylives.org.uk

Respond
Challenging vulnerability and sexual abuse in the lives of people with learning disabilities.
Freephone: 0808 808 0700
respond.org.uk

Think U Know

CEOP's internet safety website, with support and information for parents, teachers and young people on online safety and child protection.
thinkuknow.co.uk

Drinkaware
Offering information, support, guidance and resources relating to drinking and drink-related issues.
drinkaware.co.uk

Hope UK
Works with communities throughout the UK to prevent drug and alcohol-related harm to children and young people.
hopeuk.org

Frank
Confidential drugs advice.
talktofrank.com

ACT (Action Counters Terrorism)
actearly.uk

National Police Chiefs' Council (NPCC)
Police guidance in relation to education and training.
https://www.npcc.police.uk/

Modern Slavery Helpline
modernslaveryhelpline.org

Internet Matters
Online safety advice and guidance.
internetmatters.org

Educate Against Hate
Online resources, advice and information on protecting young people from extremism and radicalisation.
educateagainsthate.com

Missing People
UK charity providing a lifeline to those affected by a disappearance, or thinking of going missing.
Call or text: 116 000
missingpeople.org.uk

MIND
Mental health charity providing support and resources to help people deal with mental health issues.
mind.org.uk

NHS
Guidance and support for mental health issues via the Every Mind Matters hub.
https://www.nhs.uk/every-mind-matters/

7.14 Appendix 14 - Safeguarding Quick Guide for Staff

All staff must follow these key safeguarding principles:

- **Concern → Record → Report → DSL acts**
- Never promise confidentiality
- Always act immediately
- Safeguarding concerns take precedence over data protection
- If in doubt → speak to a DSL

All concerns must be:

- Recorded on the safeguarding system immediately (within 24 hours at the latest)
- Reported to a DSL on the same working day

If a learner is at immediate risk of harm:

- Contact emergency services immediately
- Inform a DSL without delay

Any questions, comments or suggestions regarding this document should be directed to:

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